## **EXHIBIT 1**

Page 1 1 IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS 2 HOUSTON DIVISION 3 MARK A. HANSEN, 4 Plaintiff, 5 VS. CIVIL ACTION NO. H-05-3437 6 AON RISK SERVICES OF TEXAS, 7 INC., 8 Defendant. 9 \* 10 ORAL AND VIDEOTAPED DEPOSITION OF 11 MARK A. HANSEN 12 13 MAY 10, 2006 \*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\* 14 15 ORAL AND VIDEOTAPED DEPOSITION OF MARK A. HANSEN, 16 produced as a witness at the instance of the Defendant, and duly sworn, was taken in the above-styled and numbered cause 17 on May 10, 2006, from 10:58 a.m. to 5:00 p.m., before Robin 18 Potts, CSR in and for the State of Texas, reported by 19 machine shorthand, at the Law Office of G. Scott Fiddler, 20 P.C., 13831 Northwest Freeway, Suite 510, Houston, Texas, 21 pursuant to the Federal Rules of Civil Procedure and the 22 23 provisions stated on the record or attached hereto. 24 25

> NMA Compressed Transcript

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3	FOR THE PLAINTIFF:		3	8 - E-mail from Victoria McDonough	dated 4-1-03;	106
4	Mr. G. Scott Fiddler		4	e-mail from Mark Hansen dated 4-1	-03; e-mail	
5	Law Office of G. Scott Fiddler, P.C.		5	from Victoria McDonough dated 4-	1-03; e-mail	
6	13831 Northwest Freeway, Suite 510		6	from Mark Hansen dated 3-24-03; e	-mail from	
7	Houston, TX 77040		7	Joe Propati dated 3-24-03; e-mail fr	om Elliott	
8	,		8	Jones dated 3-22-03; e-mail from Ja	ick Tieman	
9	FOR THE DEFENDANT:		9	dated 3-20-03 (5 pages)		
10	Mr. Kerry E. Notestine		10	9 - E-mail from David Barnes dated 4-	24-03; e-mail	111
111	Mr. Nitin Sud		11	from Victoria McDonough dated 4-	-	
12	Littler Mendelson		12	10 - E-mail from Victoria McDonough	, , , , ,	123
13	1301 McKinney Street, Suite 1900		13	(1 page)		1
14	Houston, TX 77010		14	11 - E-mail from Victoria McDonough	dated 5-16-03	135
	Houston, 1X 77010		15	e-mail from Bill Burke dated 5-15-0		155
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16	ALSO PRESENT:		1		ualeu 3-27-03	120
17	Willie Grimble, Videographer		17	(1 page) 13 - AON Position Description, Assista	ant Dinaster	141
18	Victoria Ryan McDonough		18	*   ·	-	141
19	Charles Lusk		19	Client Service Unit, dated 11-29-04		
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	A. University of Hartford.		A. I do not.
$\frac{2}{2}$	Q. Did you graduate?	2	Q. Did you ever serve in the military?
3	A. Yes.	3	A. No.
4	Q. What year did you graduate?	4	Q. From the time you graduated from college to the
5	A. 1992.	5	present, can you tell me what companies you've worked for?
6	Q. And what was your degree in?	6	We'll start the first place that you held employment.
7	A. It was a Bachelor of Arts in politics and	7	A. From the time I graduated college?
8	government.	8	Q. Yeah, let's start with graduating college. If you
9	Q. Have you ever attended graduate or professional	9	just worked in summer jobs during school or worked during
10	school?	10	school, I'd like to know that.
11	A. Yes.	11	A. Okay.
12	Q. What graduate or professional schools did you	12	Q. From the time you graduated from college. I don't
13	attend?	13	need to know that you worked at Burger King in the summer or
14	A. Long Island University in Brookville, New York.	14	something like that, not that you did.
15	Q. What degree did you seek from there, and did you	15	A. Well, I'll tell you I'm not sure what the timeline
16	graduate?	16	is; but I worked for a company called Developmental
17	A. Master of Public Administration, and I graduated.	17	Disabilities Institute in Smithtown, New York.
18	Q. What year?	18	Q. And what did you do for them?
19	A. I don't recall.	19	A. I was a counselor for mentally retarded or
20	Q. Did you go directly from college to graduate	20	handicapped adults.
21	school or did you work in between?	21	Q. Okay. And how long did you do that job?
22	A. I went directly from college to graduate school.	22	A. I don't recall.
23	Q. Any other education, formal education or, you	23	Q. Was this while you were in school or after school?
24	know, informal? Sometimes people attend training programs	24	A. Probably both.
25	or classes to get licenses in certain things, things like	25	Q. In undergraduate and/or MPA? What's MPA school?
	Page 35		Page 37
1	that.	1	What is that?
2	A. Yes. I have my adjustor's license, Texas	2	A. Master's of Public Administration.
3	adjustor's license, and a Texas insurance agent general	3	1
4	lines license.	ı	Q. Graduate school I'll call it. was that while you
		4	Q. Graduate school I'll call it. Was that while you were in graduate school as well?
5	O. Did you attend schools to get those licenses or	5	were in graduate school as well?  A. It could be.
5	Q. Did you attend schools to get those licenses or classes or something?		were in graduate school as well?  A. It could be.
6	classes or something?	5	were in graduate school as well?  A. It could be.  Q. And why did you leave that job?
6 7	classes or something?  A. I guess you could say "yes."	5 6 7	were in graduate school as well?  A. It could be. Q. And why did you leave that job? A. I got another job.
6 7 8	classes or something?  A. I guess you could say "yes."  Q. Who did those schools?	5 6 7 8	were in graduate school as well?  A. It could be.  Q. And why did you leave that job?  A. I got another job.  Q. What was the next job you had?
6 7 8 9	classes or something?  A. I guess you could say "yes."  Q. Who did those schools?  A. I don't recall.	5 6 7 8 9	were in graduate school as well?  A. It could be. Q. And why did you leave that job? A. I got another job. Q. What was the next job you had? A. I worked for Fireman's Fund Insurance Company.
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6 7 8 9 10 11 12	classes or something?  A. I guess you could say "yes."  Q. Who did those schools?  A. I don't recall.  Q. Like, at the community college or something like that?  A. No. It would have been for the general lines	5 6 7 8 9 10 11 12	were in graduate school as well?  A. It could be. Q. And why did you leave that job? A. I got another job. Q. What was the next job you had? A. I worked for Fireman's Fund Insurance Company. Q. What did you do for Fireman's Fund? A. I was a workers' compensation claims adjustor. Q. Were you still in school at the time?
6 7 8 9 10 11 12 13 14	classes or something?  A. I guess you could say "yes."  Q. Who did those schools?  A. I don't recall.  Q. Like, at the community college or something like that?  A. No. It would have been — for the general lines license, I studied on my own. So, I did not attend class for that. For the adjustor's license, I don't recall	5 6 7 8 9 10 11 12 13 14	were in graduate school as well?  A. It could be. Q. And why did you leave that job? A. I got another job. Q. What was the next job you had? A. I worked for Fireman's Fund Insurance Company. Q. What did you do for Fireman's Fund? A. I was a workers' compensation claims adjustor. Q. Were you still in school at the time? A. No.
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6 7 8 9 10 11 12 13 14 15	classes or something?  A. I guess you could say "yes." Q. Who did those schools? A. I don't recall. Q. Like, at the community college or something like that?  A. No. It would have been — for the general lines license, I studied on my own. So, I did not attend class for that. For the adjustor's license, I don't recall whether I did or I didn't. I don't know.	5 6 7 8 9 10 11 12 13 14	were in graduate school as well?  A. It could be. Q. And why did you leave that job? A. I got another job. Q. What was the next job you had? A. I worked for Fireman's Fund Insurance Company. Q. What did you do for Fireman's Fund? A. I was a workers' compensation claims adjustor. Q. Were you still in school at the time? A. No. Q. This was a full-time job after you graduated from graduate school?
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6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	classes or something?  A. I guess you could say "yes."  Q. Who did those schools?  A. I don't recall.  Q. Like, at the community college or something like that?  A. No. It would have been for the general lines license, I studied on my own. So, I did not attend class for that. For the adjustor's license, I don't recall whether I did or I didn't. I don't know.  Q. Do you have any other special training or licenses other than what we've talked about here?  A. I do not.  Q. Sometimes people have real estate degrees, for example, or, you know, they are a certified, you know,	5 6 7 8 9 10 11 12 13 14 15 16 17 18	were in graduate school as well?  A. It could be. Q. And why did you leave that job? A. I got another job. Q. What was the next job you had? A. I worked for Fireman's Fund Insurance Company. Q. What did you do for Fireman's Fund? A. I was a workers' compensation claims adjustor. Q. Were you still in school at the time? A. No. Q. This was a full-time job after you graduated from graduate school? A. Yes. Q. I think I understand what a workers' comp claim adjustor is, but could you just briefly describe what that is?
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1			Г			
	_	Page 38	1		77 11 1	Page 40
	Q.	And why did you leave that job?			He called me.	8
2	A.	I was offered another position.	2	-	How did he call you	1? 
3	Q.	With whom?	3		On the telephone.	
4	A.	Federated Department Stores.	4			call you? I mean, did he just
5	Q.	What did you do for Federated Department Stores?	5	-		id you know the guy?
6	A.	I handled workers' compensation claims.	6		He was my forme	
7	Q.	And do you know about when you took that job?	7	-	Former boss where	1
8	<b>A.</b>	Approximately April of 1995.	8		At Fireman's Fun	<b>d.</b>
9	Q.	So, you would have started about April of '94 with	9	-	In Boston?	
10		an's, something like that?	10		Yes.	
11		Possibly.	11			or work at the time or did he
12	Q.	How long did you work for Federated?	12	just cal	*	
13	<b>A.</b>	For one year.	13		He just called me.	
14	Q.	Did the same thing the whole time?	14			over Aon right now, and we're
15	<b>A.</b>	Yes.	15			ut what happened subsequent to
16	Q.	Why did you leave that job?	16		-	let me guess a question first.
17	<b>A.</b>	Because I was offered another position.	17			you it's Gabel; is that right?
18	Q.	With whom?	18		That's correct.	
19	<b>A.</b>	With Fireman's Fund Insurance Company.	19	-	He was working wh	
20	Q.	You went back to Fireman's Fund?	20		At Aon in New Yo	rk.
21	<b>A.</b>	Yes.	21	-	What city?	
22	Q.	And where was that job?	22		New York.	
23	<b>A.</b>	In Boston, Massachusetts.	23	-		at there was a job available in
24	Q.	Is that where you worked for Fireman's Fund	24	Housto		
25	before	??	25	<b>A.</b>	Yes.	
<b> </b>						
١.		Page 39				Page 41
	<b>A.</b>	INO.		$\sim$	Oleans Tadle lade	
2	$\sim$		l			skip over. You never worked
1	Q.	And what did you do for Fireman's Fund the second	2	for Aor	n at any place but He	ouston; is that right?
3	time?	And what did you do for Fireman's Fund the second	2 3	for Aor	n at any place but He Yes, that's correct	ouston; is that right?
3 4	time?	And what did you do for Fireman's Fund the second  I was a client services manager.	2 3 4	for Aor A. Q.	n at any place but He Yes, that's correct Okay. When you le	ouston; is that right?
3 4 5	time? A. Q.	And what did you do for Fireman's Fund the second  I was a client services manager.  Tell me what you do in that position.	2 3 4 5	for Aor A. Q.	n at any place but He Yes, that's correct Okay. When you le ough this first.	ouston; is that right?  off Aon well, actually, let me
3 4 5 6	A. Q. A.	And what did you do for Fireman's Fund the second  I was a client services manager.  Tell me what you do in that position.  I was responsible for making sure that the	2 3 4 5 6	for Aor A. Q. go thro	n at any place but Ho Yes, that's correct Okay. When you leading this first. (Exhibit No. 2 w	ouston; is that right?  If Aon well, actually, let me as marked)
3 4 5 6 7	time? A. Q. A. insure	And what did you do for Fireman's Fund the second  I was a client services manager.  Tell me what you do in that position.  I was responsible for making sure that the eds were happy with Fireman's Fund's claims,	2 3 4 5 6 7	for Aor A. Q. go thro	n at any place but He Yes, that's correct Okay. When you le ough this first. (Exhibit No. 2 w. I'm handing you wh	ouston; is that right?  If Aon well, actually, let me as marked)  at's been marked as Defendant's
3 4 5 6 7 8	A. Q. A. insure under	And what did you do for Fireman's Fund the second  I was a client services manager.  Tell me what you do in that position.  I was responsible for making sure that the eds were happy with Fireman's Fund's claims, writing, and loss control services.	2 3 4 5 6 7 8	for Aor A. Q. go thro Q. Exhibit	n at any place but He Yes, that's correct Okay. When you le ugh this first. (Exhibit No. 2 w I'm handing you wh 2. Can you identify	ouston; is that right?  off Aon well, actually, let me as marked) at's been marked as Defendant's that document, please?
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3 4 5 6 7 8 9	A. Q. A. insure under Q. A.	And what did you do for Fireman's Fund the second  I was a client services manager.  Tell me what you do in that position.  I was responsible for making sure that the eds were happy with Fireman's Fund's claims, rwriting, and loss control services.  How long did you do that job?  Until May of 2001.	2 3 4 5 6 7 8 9	for Aor A. Q. go thro Q. Exhibit A. presen	n at any place but He Yes, that's correct Okay. When you le ough this first. (Exhibit No. 2 w I'm handing you wh 2. Can you identify This is — appears ted to.	ouston; is that right?  If Aon well, actually, let me as marked) at's been marked as Defendant's that document, please? to be a copy of the resume I
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1	Page 54	1	Page 56
	Q. Do you take any sort of salary from the company?	1	in any way from your franchise business? Can you not go to
2	A. I have not.	2	work because of these symptoms?
3	Q. Did you have any customers when you started that	3	A. No. I have a bathroom at the office.
4	business or have you developed all of them since you started	4	Q. I'm sorry?
5	the business?	5	A. I have a bathroom at the office.
6	A. All developed since I started the business.	6	Q. Okay. So so, you would have to stay in your
7	Q. And how have you generated customers with the	7	bathroom for some period of time?
8	business?	8	A. So, if I had an upset stomach, I'd have to use the
9	A. Advertising.	9	bathroom. And I would have to lock the door because I was
10	Q. What do you advertise? How do you advertise?	10	the only one present at the time.
11	A. Yellow Pages, Internet.	11	Q. Okay. Any other restrictions on your ability to
12	Q. From the time you left Aon in December of 2003 to	12	earn income after your termination from Aon?
13	the present, have there been any times where you were	13	A. Not that I'm aware of.
14	physically or mentally unable to work?	14	Q. Did you have any other problems because of your
15	A. After I left?	15	termination from Aon other than these physical symptoms that
16	Q. Yeah.	16	we've mentioned already?
17	A. Yes.	17	A. Specifically
18	Q. When were you physically or mentally unable to	18	Q. Any socially? Have you been divorced because of
19	work?	19	your termination from Aon?
20	A. I was always let me rephrase my answer. I'd	20	A. No.
21	say I was always able to work.	21	Q. Have you lost your house because of your
22	Q. Okay. Okay. Was there a physical or mental	22	termination from Aon?
23	problem that limited your ability to work?	23	A. No.
24	A. Lots of stress, headaches, stomach upset,	24	Q. Have you lost your car because of your termination
25	depression	25	from Aon?
1			
1	Page 55		Page 57
1	Page 55 Q. But you	1	Page 57 A. No.
1 2	<del>-</del>	1 -	1
l _	Q. But you	1	A. No.
2	<ul><li>Q. But you</li><li>A anxiety about income.</li></ul>	1 2	A. No. Q. Anything like that? I don't want to limit it to
2 3	<ul> <li>Q. But you</li> <li>A anxiety about income.</li> <li>Q. But you never saw a doctor or a mental health</li> </ul>	1 2 3	A. No. Q. Anything like that? I don't want to limit it to that. I mean, I want to know what you think you suffered as
2 3 4	<ul> <li>Q. But you</li> <li>A anxiety about income.</li> <li>Q. But you never saw a doctor or a mental health professional about any of those problems?</li> <li>A. No.</li> </ul>	1 2 3 4	A. No.  Q. Anything like that? I don't want to limit it to that. I mean, I want to know what you think you suffered as a result of your of your termination from Aon.
2 3 4 5	<ul> <li>Q. But you</li> <li>A anxiety about income.</li> <li>Q. But you never saw a doctor or a mental health professional about any of those problems?</li> <li>A. No.</li> </ul>	1 2 3 4 5	A. No. Q. Anything like that? I don't want to limit it to that. I mean, I want to know what you think you suffered as a result of your — of your termination from Aon. A. Well, specifically to the items you mentioned, the
2 3 4 5 6	<ul> <li>Q. But you</li> <li>A anxiety about income.</li> <li>Q. But you never saw a doctor or a mental health professional about any of those problems?</li> <li>A. No.</li> <li>Q. That's correct, you didn't?</li> </ul>	1 2 3 4 5 6	A. No. Q. Anything like that? I don't want to limit it to that. I mean, I want to know what you think you suffered as a result of your — of your termination from Aon. A. Well, specifically to the items you mentioned, the answer is "no." I did not lose my house. I did not lose my
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	<ul> <li>Q. But you</li> <li>A anxiety about income.</li> <li>Q. But you never saw a doctor or a mental health professional about any of those problems?</li> <li>A. No.</li> <li>Q. That's correct, you didn't?</li> <li>A. I did not see a medical professional about those problems.</li> <li>Q. Did you ever take any medication or anything?</li> <li>A. No.</li> <li>Q. Ever receive counseling of any sort?</li> <li>A. No.</li> <li>Q. Who would know about</li> <li>A. Medication, can you clarify "medication"? Like,</li> <li>Pepto Bismol?</li> <li>Q. I guess Pepto Bismol would be medication.</li> <li>A. Then yes.</li> <li>Q. Anything besides Pepto Bismol?</li> <li>A. Tums.</li> <li>Q. Anything besides Pepto Bismol and Tums?</li> <li>A. Any other over-the-counter remedy.</li> </ul>	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. No. Q. Anything like that? I don't want to limit it to that. I mean, I want to know what you think you suffered as a result of your — of your termination from Aon. A. Well, specifically to the items you mentioned, the answer is "no." I did not lose my house. I did not lose my car. Q. Any — but I want to know what you think you suffered as a result of your loss of employment. I just gave you some examples of things that have said — people have said in other cases. But did you suffer anything else because of your loss of employment? A. I've suffered loss of monetary income, savings. Q. And you've produced a document that sort of describes that; right? A. I believe so. Q. Anything else besides that? A. I'm not aware of any at the time. I don't know. MR. NOTESTINE: five-minute break. Okay? It's a stopping point.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	<ul> <li>Q. But you</li> <li>A anxiety about income.</li> <li>Q. But you never saw a doctor or a mental health professional about any of those problems?</li> <li>A. No.</li> <li>Q. That's correct, you didn't?</li> <li>A. I did not see a medical professional about those problems.</li> <li>Q. Did you ever take any medication or anything?</li> <li>A. No.</li> <li>Q. Ever receive counseling of any sort?</li> <li>A. No.</li> <li>Q. Who would know about</li> <li>A. Medication, can you clarify "medication"? Like, Pepto Bismol?</li> <li>Q. I guess Pepto Bismol would be medication.</li> <li>A. Then yes.</li> <li>Q. Anything besides Pepto Bismol and Tums?</li> <li>A. Any other over-the-counter remedy.</li> <li>Q. No prescription remedies?</li> </ul>	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. No. Q. Anything like that? I don't want to limit it to that. I mean, I want to know what you think you suffered as a result of your — of your termination from Aon. A. Well, specifically to the items you mentioned, the answer is "no." I did not lose my house. I did not lose my car. Q. Any — but I want to know what you think you suffered as a result of your loss of employment. I just gave you some examples of things that have said — people have said in other cases. But did you suffer anything else because of your loss of employment? A. I've suffered loss of monetary income, savings. Q. And you've produced a document that sort of describes that; right? A. I believe so. Q. Anything else besides that? A. I'm not aware of any at the time. I don't know. MR. NOTESTINE: Why don't we take a five-minute break. Okay? It's a stopping point. THE VIDEOGRAPHER: Going off the record.

				Pa
Q.	(BY MR. NOTESTINE)	Okay.	We've talked,	

- 2 Mr. Hansen, about your work before you went to Aon and what
- 3 you've done subsequent. What I want to do now is start and
- 4 go through your employment at Aon. Could you tell us when
- 5 you first started working for Aon?
- 6 A. May 2001.

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7

- Q. And tell me the process you went through to get
- 8 the job. I know you've mentioned briefly already what it
- 9 was, but kind of give me sort of the details you went
- 10 through to get the job.
- 11 A. John Gabel called me. I applied for the position,
- 12 interviewed for the position, and received the position.
- 13 Q. Mr. Gabel had formerly worked with you at
- 14 Fireman's Fund; is that right?
- 15 A. That's correct.
- 16 Q. And then he apparently had moved and became an
- 17 executive with Aon; right?
- 18 A. Yes.
- 19 Q. And what was his position at the time?
- 20 A. I believe he was a managing director.
- 21 Q. Did he have some supervisory authority over what
- 22 was going on in Houston?
- 23 A. Yes, my position specifically.
- 24 Q. So, at the time of your hire, you reported
- 25 directly to Mr. Gabel?

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1 Q. Okay. And, so, what was the service center doing

- 2 in order to facilitate that process?
- 3 A. They were an order would come in for a
- 4 certificate. They would create that certificate. And
- 5 that's just one of the functions.
- 6 Q. So, Aon would have brokers or salespeople working
- 7 with the companies directly and then -- you know,
- 8 determining what the insurance needs were for the company?
- 9 A. Correct.
- 10 Q. And then the service center would do what, would
- 11 do sort of all the --
- 12 A. The back room.
- 13 Q. -- the back room details for --
- 14 A. Correct.
- 15 Q. -- getting that insurance coverage that they had
- 16 sold for the company?
- 17 A. Yes.
- 18 Q. And what specifically were you doing?
- 19 A. When I first started, I was the director of
- 20 technical operations. So, my unit was responsible for
- 21 claims, loss control, and data management.
  - Q. Okay. Let's talk about that. What -- what are
- 23 claims?

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1

- A. It was actually claims advocacy. Our group didn't
- 25 actually adjust claims.

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A. Yes.

1

- 2 Q. Can you tell us about the Houston office, what --
- 3 what sort of work was going on there, who was working there?
- 4 I mean, not every name of every person; but can you tell me
- 5 what the operation of the Houston office was like?
- 6 A. They were reorganizing into a service center for 7 the south region.
- o o arm
- 8 Q. What do you mean by a service center? The jury is
- 9 probably not familiar with the insurance brokerage business.
- 10 So, could you tell us what kind of service they would be
- 11 providing that they needed a center?
- 12 A. Yes. They were providing certificates, that all
- 13 insurance certificates would be done in one central
- 14 location.
- 15 Q. And what is an insurance certificate?
- 16 A. It's the certificate that shows a certificate
- 17 holder that a particular insured has coverage.
- 18 Q. So, like, I'm some company, like, Acme Oil
- 19 Company. And, so, I need insurance for property or casualty
- 20 loss, right, or something? And, so, they -- they ask Aon to
- 21 what? You tell me how it works. So, what is their
- 22 certificate and why would a company need a certificate?
- 23 A. Well, the certificate would show that they have
- 24 coverage and that the person is listed as a certificate
- 25 helder or an additional insured.

- Q. Now, why would somebody need to have a claims
- 2 advocate?
- 3 A. So someone could from the brokerage side work with
  - the insurance company to ensure the claim was handled
- 5 appropriately and for the correct amount.
- 6 Q. So, one of Aon's customers would have a loss of
- 7 some sort?
- 8 A. Correct.
  - Q. It may be property damage, let's say. Or let's
- 10 say they have a fleet of vehicles and somebody's car gets
- 11 stolen.

- 12 A. Yes.
- O. So, then Aon would act on behalf of the insured to
- 14 make sure that the insurance company paid the claim; is that
- 15 right?
- 16 A. Well, to make sure the claim was handled
- 17 correctly.
- 18 Q. Okay. If -- if it was a covered claim and it
- 19 was ---
- 20 A. Correct.
- 21 O. And, so, what was your group doing exactly?
- 22 A. They were providing that advocacy role.
- Q. So, the broker would say, "Hey, you know, Acme
- 24 Corporation needs some assistance on this theft. And could
- 25 you work with the insurance company, make sure it gets taken

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Q. Okay. And what is client account services? What 1 1 A. No. 2 does that mean? 2 So, that disbanded. At that time you quit 3 A. It was the unit that primarily handled the 3 reporting to Mr. Gabel? submissions, created the submissions for the middle --4 A. That's correct. middle market business, the -- not the largest clients, Q. Up to that time had you been evaluated in your the -- the smaller clients that were serviced in the service performance in any way by Mr. Gabel? 6 center. A. Yes. Q. Okay. So, the company sort of divided up the 8 Q. Tell me what the company's process was for clients by big clients and not so big clients? evaluating people's performance. Yearly review? Semiannual 9 10 A. Correct. 10 review? They never did anything? Tell - just tell me what 11 Q. Middle market was everybody that wasn't a big 11 the process was. 12 client? 12 A. At that point I believe it was a yearly review. 13 A. I would guess so. 13 And do you know what your review was from Q. 14 Q. And you did account services. Some of the people 14 Mr. Gabel? I don't -- I was not given a written review. in the jury that might be listening to this or watching this 15 15 A. may not understand what that means. Could you tell us what 16 16 Q. Okay. So, he just talked to you about it? 17 that --17 Yes. A. 18 A. The unit was primarily charged with creating the 18 Q. What did he say? 19 submissions that would go to insurance companies so that the 19 A. I don't recall. 20 insurance companies could quote the insurance. And then 20 Q. Okay? Not okay? 21 they were responsible for ordering any of the postplacement, 21 A. Okay is -- is -- I would say --22 such as certificates or invoicing or anything regarding 22 Q. As far as you remember, it was okay? 23 postplacement for the account that they were working on. 23 A. Yes. Otherwise, I'm sure that some other action 24 Q. And tell me how you got this position as client 24 would have been taken. 25 account super -- services director, director of the client 25 Q. So, then, when the technical operations group was Page 75 disbanded, then you started doing special projects working 1 account services group. Did you interview for it? Did 1 2 somebody just walk in and say, "This is what you're doing for Miss McDonough? next"? Or how did that happen? 3 A. That's correct. 3 Q. When did -- you had mentioned before there was no 4 A. I was doing special assignments. And then I 4 level of management between you and Mr. Gabel when you recall a conversation where I was asked to put together a 5 started. When did Miss McDonough come in? It sounds like business plan to improve the client account services unit. 6 7 I provided the business plan. And then I was told, "Well, I 7 she was in a level management in Houston above you. 8 guess I'll give it to you." 8 A. She was. 9 Q. Who said that? 9 Q. When did that -- when did that happen? 10 A. Vicki McDonough. 10 A. As soon as the tech - technical operations Q. And what was Miss McDonough's position? 11 11 department was disbanded. A. She was a managing director of the Houston client Q. They hired Miss McDonough to run the -- or what 12 12 services unit, CSBU. At the time it was called that. 13 happened? Q. Okay. Were you reporting to her at that time? 14 A. No. I believe she was there running other 14 15 A. Yes. 15 departments. Q. So, she became the managing director of the Q. So, tell me when you started reporting to Miss 16 16 McDonough. Houston office? 17 17 18 A. It would be sometime in the spring of 2002 after 18 Correct. Q. Everything that was going on there? 19 technical operations disbanded. 19 Q. So, you're doing special projects work originally 20 20 A. Of the service center. for Mr. Gabel? 21 And --21 A. I was the only department in the service center 22 A. No. I would - when I was doing special projects, 22 I reported directly to Miss McDonough. 23 that didn't report directly to a managing director in 23 Q. Was she managing you as technical -- director of 24 24 Houston. Q. Okay. So, then you started reporting to a technical operations for some period of time? 25

	Page 86		Page 88
	1 Q. When you had the discussions with the HR people	1	
1	2 about disciplining or terminating people, did the people's	2	
ı	3 gender ever come up?	3	
	4 A. No.	4	5
1	5 Q. Okay. I think you were looking through this	5	
1	6 document to see if this is an accurate description of the	6	(
	7 job that you did while you were working in the placement	7	
	8 services unit.	8	
	9 A. Yes.	9	
1	10 Q. It says under on the second page "Professional	10	•
	11 Education And Experience, Advanced degree preferred." And	11	
1	12 you had an advanced degree; right?	12	
	13 A. Yes.	13	
J	14 Q. An MPA, I think?	14	J - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -
-	15 A. Yes.	15	
1	16 Q. And it talks about some other categories of of	16	•
	17 experiences of experience or criteria. The first one is	17	· · · · · · · · · · · · · · · · · · ·
-	18 "Extensive knowledge of and experience in the insurance industry; must attain and maintain appropriate brokers	18	1 0 1
1		19	3 1,
-1	·	20	
	A. I acquired that in July 2002.  Q. A broker license?	21 22	
	23 A. A general lines license.	23	-
1	24 Q. Is that — is that what we talked about before in	23 24	-   · · · · · · · · · · · · · · · · · ·
1	25 your job description, the the all states thing that we	25	
1	you goo door phon, are the an outed thing that we		Q. I ou never heard that term of it was never
$\vdash$			
T	Page 87		Page 89
	1 talked about? Is that	1	discussed?
	<ul> <li>1 talked about? Is that</li> <li>2 A. The property and casualty license, yes.</li> </ul>	1 2	
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	Page 90		Page 92
1	you go"?	1	across to Oklahoma and down to Texas.
2	A. I don't recall at this point.	2	Q. So, the southeastern part of the United States?
3	Q. Did you discuss her gender at all with Miss	3	A. Yes.
4	McDonough when you were discussing her	4	Q. And all the offices that might be in any of those
5	A. Her gender was not discussed, no.	5	places?
6	Q. Who's John Canter?	6	A. Yes.
7	A. John Canter was the director of client account	7	Q. I haven't really asked this, but could you just
8	services prior to my taking that position.	8	for the jury just give a short description of what the
9	Q. And what happened to him?	9	business of Aon is? What do they do?
10	A. He was terminated from the position.	10	A. They work with customers to find insurance
11	Q. Do you know why?	11	companies that will write insurance for their business and
12	A. I do not.	12	then they procure that insurance and then they - they
13	Q. Were you involved in the decision at all?	13	manage that process and make sure their insurance program is
14	A. I was not.	14	correctly handled. And they have other divisions that I'm
15	Q. Did you have any discussions with Miss McDonough	15	not - I don't have the specifics on them.
16	in any way?	16	Q. Okay. And, so, the and the region that you
17	A. I did not.	17	worked in, that was just one part. And you did the same
18	Q. Do you have any reason to believe he was	18	thing basically as Aon generally did; right? There were
19	discriminated against based on his gender?	19	brokers there and the brokers did what you said and then
20	A. I don't know.	20	they had back office people that sort of executed all the
21	Q. Tell me some of the things you had to do in this	21	work and that kind of stuff; right?
22	job. Did you ever have to travel, for example?	22	A. Yes.
23	A. Yes.	23	Q. Do you remember ever having a presentation you
24	Q. Why would you have to travel?	24	were supposed to be doing in Dallas and you not did not
25	A. To visit some of the offices that we supported.	25	do it?
	Page 91		Page 93
1	Page 91 Q. And why would it be necessary to visit those	1	Page 93  A. No. I remember a presentation in North Carolina.
1 2		1 2	·
1 .	Q. And why would it be necessary to visit those	l	A. No. I remember a presentation in North Carolina.
2	Q. And why would it be necessary to visit those offices?	2	<ul><li>A. No. I remember a presentation in North Carolina.</li><li>Q. Okay. Tell me about that situation.</li></ul>
2	<ul><li>Q. And why would it be necessary to visit those offices?</li><li>A. See if they were familiar with the people that</li></ul>	2 3	<ul> <li>A. No. I remember a presentation in North Carolina.</li> <li>Q. Okay. Tell me about that situation.</li> <li>A. That was a presentation that Miss McDonough and I</li> </ul>
2 3 4	<ul> <li>Q. And why would it be necessary to visit those offices?</li> <li>A. See if they were familiar with the people that were working on their accounts.</li> <li>Q. And would you go by yourself or would you go with other people or how would that typically work?</li> </ul>	2 3 4	<ul> <li>A. No. I remember a presentation in North Carolina.</li> <li>Q. Okay. Tell me about that situation.</li> <li>A. That was a presentation that Miss McDonough and I were going to do together; and, unfortunately, I was not able to make that.</li> <li>Q. Okay. What what happened that you weren't able</li> </ul>
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. And why would it be necessary to visit those offices?  A. See if they were familiar with the people that were working on their accounts.  Q. And would you go by yourself or would you go with other people or how would that typically work?  A. Usually we would go with other people.  Q. And when you were there, you would just kind of walk around and say hi to people or would there be presentations or were there—  A. Typically there would be a presentation. It would be an announced visit.  Q. And did you usually give these presentations or how did that work?  A. I don't recall. It could have been a combination of folks. I do recall one—one presentation that I made to the Miami office regarding how the new business unit	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. No. I remember a presentation in North Carolina.  Q. Okay. Tell me about that situation.  A. That was a presentation that Miss McDonough and I were going to do together; and, unfortunately, I was not able to make that.  Q. Okay. What what happened that you weren't able to make that?  A. I didn't get to the plane before they closed the door.  Q. So, was that a problem?  A. She said it wasn't. She said, "Don't worry about it. Go back to the office."  Q. Did you ever have any other problems making presentations you were supposed to make in any other place?  A. I don't recall.  Q. While you were the director of the PSU, do you remember who worked for you specifically as ADs, assistant
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. And why would it be necessary to visit those offices?  A. See if they were familiar with the people that were working on their accounts.  Q. And would you go by yourself or would you go with other people or how would that typically work?  A. Usually we would go with other people.  Q. And when you were there, you would just kind of walk around and say hi to people or would there be presentations or were there—  A. Typically there would be a presentation. It would be an announced visit.  Q. And did you usually give these presentations or how did that work?  A. I don't recall. It could have been a combination of folks. I do recall one—one presentation that I made to the Miami office regarding how the new business unit worked.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. No. I remember a presentation in North Carolina.  Q. Okay. Tell me about that situation.  A. That was a presentation that Miss McDonough and I were going to do together; and, unfortunately, I was not able to make that.  Q. Okay. What what happened that you weren't able to make that?  A. I didn't get to the plane before they closed the door.  Q. So, was that a problem?  A. She said it wasn't. She said, "Don't worry about it. Go back to the office."  Q. Did you ever have any other problems making presentations you were supposed to make in any other place?  A. I don't recall.  Q. While you were the director of the PSU, do you remember who worked for you specifically as ADs, assistant directors?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. And why would it be necessary to visit those offices?  A. See if they were familiar with the people that were working on their accounts.  Q. And would you go by yourself or would you go with other people or how would that typically work?  A. Usually we would go with other people.  Q. And when you were there, you would just kind of walk around and say hi to people or would there be presentations or were there—  A. Typically there would be a presentation. It would be an announced visit.  Q. And did you usually give these presentations or how did that work?  A. I don't recall. It could have been a combination of folks. I do recall one—one presentation that I made to the Miami office regarding how the new business unit worked.  Q. How many different offices did your group support?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. No. I remember a presentation in North Carolina.  Q. Okay. Tell me about that situation.  A. That was a presentation that Miss McDonough and I were going to do together; and, unfortunately, I was not able to make that.  Q. Okay. What what happened that you weren't able to make that?  A. I didn't get to the plane before they closed the door.  Q. So, was that a problem?  A. She said it wasn't. She said, "Don't worry about it. Go back to the office."  Q. Did you ever have any other problems making presentations you were supposed to make in any other place?  A. I don't recall.  Q. While you were the director of the PSU, do you remember who worked for you directors?  A. Yes, I do.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. And why would it be necessary to visit those offices?  A. See if they were familiar with the people that were working on their accounts.  Q. And would you go by yourself or would you go with other people or how would that typically work?  A. Usually we would go with other people.  Q. And when you were there, you would just kind of walk around and say hi to people or would there be presentations or were there—  A. Typically there would be a presentation. It would be an announced visit.  Q. And did you usually give these presentations or how did that work?  A. I don't recall. It could have been a combination of folks. I do recall one—one presentation that I made to the Miami office regarding how the new business unit worked.  Q. How many different offices did your group support?  A. Multiple offices.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. No. I remember a presentation in North Carolina.  Q. Okay. Tell me about that situation.  A. That was a presentation that Miss McDonough and I were going to do together; and, unfortunately, I was not able to make that.  Q. Okay. What what happened that you weren't able to make that?  A. I didn't get to the plane before they closed the door.  Q. So, was that a problem?  A. She said it wasn't. She said, "Don't worry about it. Go back to the office."  Q. Did you ever have any other problems making presentations you were supposed to make in any other place?  A. I don't recall.  Q. While you were the director of the PSU, do you remember who worked for you directors?  A. Yes, I do.  Q. And who were they?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	<ul> <li>Q. And why would it be necessary to visit those offices?</li> <li>A. See if they were familiar with the people that were working on their accounts.</li> <li>Q. And would you go by yourself or would you go with other people or how would that typically work?</li> <li>A. Usually we would go with other people.</li> <li>Q. And when you were there, you would just kind of walk around and say hi to people or would there be presentations or were there —</li> <li>A. Typically there would be a presentation. It would be an announced visit.</li> <li>Q. And did you usually give these presentations or how did that work?</li> <li>A. I don't recall. It could have been a combination of folks. I do recall one — one presentation that I made to the Miami office regarding how the new business unit worked.</li> <li>Q. How many different offices did your group support?</li> <li>A. Multiple offices.</li> <li>Q. Was there certain states that your group</li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. No. I remember a presentation in North Carolina.  Q. Okay. Tell me about that situation.  A. That was a presentation that Miss McDonough and I were going to do together; and, unfortunately, I was not able to make that.  Q. Okay. What what happened that you weren't able to make that?  A. I didn't get to the plane before they closed the door.  Q. So, was that a problem?  A. She said it wasn't. She said, "Don't worry about it. Go back to the office."  Q. Did you ever have any other problems making presentations you were supposed to make in any other place?  A. I don't recall.  Q. While you were the director of the PSU, do you remember who worked for you specifically as ADs, assistant directors?  A. Yes, I do.  Q. And who were they?  A. It was Janice Stephens and Rachel Morales.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. And why would it be necessary to visit those offices?  A. See if they were familiar with the people that were working on their accounts.  Q. And would you go by yourself or would you go with other people or how would that typically work?  A. Usually we would go with other people.  Q. And when you were there, you would just kind of walk around and say hi to people or would there be presentations or were there—  A. Typically there would be a presentation. It would be an announced visit.  Q. And did you usually give these presentations or how did that work?  A. I don't recall. It could have been a combination of folks. I do recall one—one presentation that I made to the Miami office regarding how the new business unit worked.  Q. How many different offices did your group support?  A. Multiple offices.  Q. Was there certain states that your group supported?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. No. I remember a presentation in North Carolina.  Q. Okay. Tell me about that situation.  A. That was a presentation that Miss McDonough and I were going to do together; and, unfortunately, I was not able to make that.  Q. Okay. What what happened that you weren't able to make that?  A. I didn't get to the plane before they closed the door.  Q. So, was that a problem?  A. She said it wasn't. She said, "Don't worry about it. Go back to the office."  Q. Did you ever have any other problems making presentations you were supposed to make in any other place?  A. I don't recall.  Q. While you were the director of the PSU, do you remember who worked for you directors?  A. Yes, I do.  Q. And who were they?  A. It was Janice Stephens and Rachel Morales.  Q. And did you generally have a good working
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. And why would it be necessary to visit those offices?  A. See if they were familiar with the people that were working on their accounts.  Q. And would you go by yourself or would you go with other people or how would that typically work?  A. Usually we would go with other people.  Q. And when you were there, you would just kind of walk around and say hi to people or would there be presentations or were there—  A. Typically there would be a presentation. It would be an announced visit.  Q. And did you usually give these presentations or how did that work?  A. I don't recall. It could have been a combination of folks. I do recall one—one presentation that I made to the Miami office regarding how the new business unit worked.  Q. How many different offices did your group support?  A. Multiple offices.  Q. Was there certain states that your group supported?  A. Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. No. I remember a presentation in North Carolina.  Q. Okay. Tell me about that situation.  A. That was a presentation that Miss McDonough and I were going to do together; and, unfortunately, I was not able to make that.  Q. Okay. What what happened that you weren't able to make that?  A. I didn't get to the plane before they closed the door.  Q. So, was that a problem?  A. She said it wasn't. She said, "Don't worry about it. Go back to the office."  Q. Did you ever have any other problems making presentations you were supposed to make in any other place?  A. I don't recall.  Q. While you were the director of the PSU, do you remember who worked for you directors?  A. Yes, I do.  Q. And who were they?  A. It was Janice Stephens and Rachel Morales.  Q. And did you generally have a good working relationship with them?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. And why would it be necessary to visit those offices?  A. See if they were familiar with the people that were working on their accounts.  Q. And would you go by yourself or would you go with other people or how would that typically work?  A. Usually we would go with other people.  Q. And when you were there, you would just kind of walk around and say hi to people or would there be presentations or were there—  A. Typically there would be a presentation. It would be an announced visit.  Q. And did you usually give these presentations or how did that work?  A. I don't recall. It could have been a combination of folks. I do recall one—one presentation that I made to the Miami office regarding how the new business unit worked.  Q. How many different offices did your group support?  A. Multiple offices.  Q. Was there certain states that your group supported?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. No. I remember a presentation in North Carolina.  Q. Okay. Tell me about that situation.  A. That was a presentation that Miss McDonough and I were going to do together; and, unfortunately, I was not able to make that.  Q. Okay. What what happened that you weren't able to make that?  A. I didn't get to the plane before they closed the door.  Q. So, was that a problem?  A. She said it wasn't. She said, "Don't worry about it. Go back to the office."  Q. Did you ever have any other problems making presentations you were supposed to make in any other place?  A. I don't recall.  Q. While you were the director of the PSU, do you remember who worked for you directors?  A. Yes, I do.  Q. And who were they?  A. It was Janice Stephens and Rachel Morales.  Q. And did you generally have a good working

- named I don't remember her specific name right now and
- 2 she was having difficulty performing the job duties. And I
- was looking to see if there was another department that
- would be better suited for her. She was a very nice woman.
- And I called to ask if we could talk about that, and that's
- when I was asked to come upstairs.
- 7 Q. Before I get to that, let me -- let me -- you were
- talking there about transferring one of your employees to 8
- another department.
- 10 A. Right.
- Q. And you've had several different jobs up to this 11
- point. Was that pretty common in Aon for people to move 12
- around between different departments and --13
- A. I don't know. 14
- 15 You don't know one way or the other?
- 16 The company was going through a large
- 17 reorganization. So -
- Q. It sounds like they had reorganizations a lot. Is 18
- 19 that right or not right?
- 20 A. I don't know if you would consider it a lot or
- 21 not.
- 22 Q. Was -- did employees have some responsibilities
- 23 for locating their own positions if things weren't working
- 24 out in a particular job they were having? Is that something
- you could do? You could decide, "Hey, I really don't like 25

- Page 116 was to take a severance package. One was to find another
- job within the company. And it was at that point I was told
- I couldn't have the director of document production position
- because it required a lot of insurance experience and Donna
- had raised the bar and I wouldn't want it, she said.
- 6 Q. Who's Donna?
  - A. Donna Parsley is the woman who is the director of
- 8 that department at the time.
  - Q. Okay. So, was that position available or
- 10 something?

7

9

- 11 A. At that time?
- Q. Yeah. You said she -- you couldn't have the 12
- director of document production while Donna was in it. Why 13
- would you have it anyway? 14
- 15 A. Because there was going to be a reorganization of
- 16 all the directors.
- 17 Q. Okay. And, so, Donna was going to move to another
- position; and you understood that? 18
- 19 A. At that time I didn't know that. The statement
- was, "You can't have the position because it requires a lot 20
- 21 of insurance experience, and Donna has raised the bar."
  - Q. What does it mean by raising the bar?
- 23 A. I don't know. I'm just stating verbatim what was
- 24 told to me.

22

1

Q. Did that mean anything to you? 25

Page 115

- what I'm doing. I want to go to, you know, syndication and get a job there"? Is that something you could do? 2
- A. I imagine if you were interested, you could put in 3 an application. 4
- Q. And it would work the other way? If the company
- thought that maybe a position here wasn't the right fit for 6
- an employee, you could look around, see if there was other 7
- positions available that they might be able to fit into? Is
- that something that happened at Aon?
- 10 You might say that, yes.
- Q. It wasn't necessarily a, "If you don't fit in 11
- here, you're out the door"? You could look and find other
- 13 jobs? That's a pretty common situation or was that unusual
- 14 in Aon?
- A. Well, it's a large company. So, there's there 15
- are opportunities available, whether or not you qualify for 16
- 17 them.
- 18 O. Okay. So, back to your discussion about demotion.
- 19 So, they called you up -- or Miss McDonough called you up to
- talk to you after your inquiry about a subordinate employee 20
- 21 of yours; right?
- 22 A. That's correct.
- 23 Q. So, tell me what happened next.
- 24 A. I was told that it wasn't working out and that I
- could have three options. And one was to be demoted. One

- I wouldn't assume anything.
- So, you don't know what that means one way or the 2 Q.

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- 3 other?
- 4 A. I'm not going to assume because it wasn't my
- 5 words.
- Q. Okay. Did Miss Mc -- by the way, was it only 6
- between you and Miss McDonbugh or was anybody else there? 7
- A. No, no one else was present. 8
- 9 Q. Did Miss McDonough say why she was giving you
- these three options? 10
- A. She told me that my turnover was high, but yet she 11
- provided no statistics to prove that compared to any of the 12
- 13 other departments.
- Q. Well, you've just talked about the fact that your 14
- turnover was high. But your position is that other groups 15
- had similar high turnover? 16
- A. The country as a whole. 17
- 18 Q. The con --
- 19 All four Aon client service centers had turnover. A.
- Q. Were you aware of what specifically the turnover 20
- was in the other departments? 21
- 22 A. I was not.
- 23 Q. At this time who were your peers in the company in
- terms of gen -- in terms of gender? What -- how many people 24
- 25 were there and what were their genders?

}	Page 118		Page 120
1	A. Specifically in the Houston center?	1	assistant director position.
2	Q. Well, who you said she said that the turnover	2	Q. Do you believe that that was because of your
3	was high, but she didn't give any I don't remember	3	gender?
4	exactly what your words were, but that it was high in other	4	A. Yes.
5	groups too and they weren't nothing was happening to	5	Q. Why?
6	them or something to that effect is what I took from what	6	A. Because I was male. I was replaced by a woman.
7	you said. So, I'm asking, what were the other groups and	7	Q. Who replaced you?
8	what what were the genders of the directors of those	8	A. Sharon Patin.
9	other groups?	9	I was qualified to do the position. The reason
10	A. Well, directly within the Aon the Houston	10	for termination was incorrect, false. And then other men
11	center, you'd have policy maintenance run by Sharon Patin.	11	had been demoted at the same also or terminated.
12	You'd have client services unit run by Dan Yelich. You'd	12	Q. What what other men had been demoted?
13	have document production run by Donna Parsley. You'd have	13	A. John Canter.
14	operations support services run by Kimberley Overgoner. And	14	Q. And you talked about him before; right?
15	I believe that may be it.	15	A. Yes.
16	Q. Okay. Those were the groups at the time of your	16	Q. Remind me what he - what happened to him?
17	demotion?	17	A. He was the director of client account services
18	A. I believe so, if I recall correctly.	18	before I took that position.
19	Q. And Miss McDonough supervised all those people?	19	Q. Do you know anything about his performance?
20	A. Yes.	20	A. I do not.
21	Q. And can you tell us what your performance was	21	Q. Okay. Anybody else who had been demoted? Let's
22	compared to those other people, to your knowledge?	22	talk about demotion first. Then we'll talk about
23	A. I don't know what the other people's performance	23	termination next.
24	was.	24	A. Not that I can recall.
25	Q. Do you know what their turnover was, which is	25	Q. Had there been any females demoted?
		_	
١,	Page 119	١.	Page 121
	A. I do not.	1	A. Not that I can recall.
2	Q. Did Miss McDonough say anything about why she was	2	Q. Now terminated. Who what males had been terminated at this time?
3	offering you three options instead of just demoting you?	3	
4	A. No.	4	A. Well, you could consider John Canter was John was terminated.
3	Q. Do you have any thoughts about that?	5	
6	A. No.	6	<ul><li>Q. Was he still with the company, though?</li><li>A. After his termination from the director position?</li></ul>
7	Q. Did you feel that it was inappropriate for her to	7	
8	offer you three options? I think you said demotion,	8	Q. Yeah. A. I believe so.
9	outplacement, or intracompany transfer. Was that	9 10	A. I believe so.  Q. What, he found another job within the company
10	inappropriate in any way?	11	[,
11	A. No, that's correct.	12	someplace?  A. I – I believe so.
12	Q. That's a correct statement, but is — is — was her offering those three options to you inappropriate in any	13	Q. Sort of like the third option that Miss McDonough
13	way?	14	gave you, an intracompany transfer?
14	· · ·	15	A. I don't know what he was offered.
15 16	<ul><li>A. No.</li><li>Q. What was the demotion to? What position were you</li></ul>	16	Q. But that was something else that was an option
ì	going to be demoted to?	17	that he could do?
17		18	A. I don't know.
18	A. To the position that I took, assistant director of	18	
19	client services unit.	l	Q. Do you know if there's any positions available for you to transfer to at the time of your demotion?
20	Q. Did she say anything about your pay? Was it going	20	·
21	to be decreased or increased?	21 22	
22	A. No. It would remain unchanged.	ĺ	Q. Did you look in any way to try and find another job?
23	Q. Did you consider this to be a adverse act by Miss	23 24	
24 25	McDonough?  A. Yes. I was demoted from a director position to an	24 25	A. No, not within the company.  Q. To your knowledge, did Miss McDonough look and see
123		L Z J	C. 10 YOU KNOYYICUSE, UIU IYIISS IYICIJOHUUSH IOOK AHU SEE
	A. 1 cs. 1 was demoted from a director position to an		

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- if there's any positions for you that were available? 1
- 2 A. Well, you could infer that from this; but I don't
- 3 know.
- 4 Q. You don't know one way or the other; is that
- 5 correct?
- 6 A. Yes.
- 7 Q. Do you -- do you know anybody that was -- took a
- 8 severance package, sort of your second option, at or around
- 9 this time, male or female?
- 10 A. I don't.
- 11 Q. Did she say anything about your gender when she
- 12 told you that she was giving you these three options?
- 13 A. No.
- 14 Q. Any other reason you believe that the -- this
- meeting where these three options were given was because of 15
- 16 your gender?
- 17 A. I provided those specifics.
- 18 Q. What you've already said; right?
- 19 A. Correct.
- 20 Q. Nothing else?
- 21 A. Correct.
- 22 Q. I'm just -- I'll keep saying, "Nothing else,"
- 23 until you say, "No."
- 24 A. Okay.
- 25 Q. Did you feel at the time that you were being

- Page 124 sent to Mr. Barnes, who's in HR, about the meeting you just
- discussed. Okay? Let's just kind of go over this real
- briefly. "I spoke with Mark vesterday." So, it would have 3
- been March 5th. Is that about the right date? 4
- 5 A. Would that be May the 5th?
  - Q. I'm sorry. May 5th. You're right. I'm sorry.
- 7 May 5th.

6

9

- 8 A. Yes, that's - that sounds correct.
  - O. "I advised him that his department is not working
- 10 effectively and that we need to make a change in management
- 11 to assure that we get the results we need." Did she talk
- 12 about that with you?
- 13 A. No. All I was told was turnover.
- 14 O. Is it possible she said that, you just don't
- remember it? Or is it your testimony that she did not say 15
- 16 that?
  - She may have said that. Yeah, I'll say she said A.
- 18 that.

17

- Okay. Then it says "The issues are excessive 19
- 20 turnover, monitoring of the work and level of talent within
- 21 the department." Do you -- was there anything said about
- 22 that?

6

7

9

- 23 A. No. I disagree with the statement.
- 24 Well, I know you disagree with the statement; but

Page 125

25 did she say that to you?

Page 123

- discriminated against based on your gender?
- 2 A. Yes.
- 3 Q. Did you file a charge on this?
- 4 A. I did not.
- 5 Q. Why not?
- 6 A. Because I didn't believe that if I reported it
- within the company that it would be acted upon and it would
- have a negative impact on me as I continued to try to
- perform the assistant director's position.
- 10 Q. And you didn't file a charge of discrimination
- 11 with the EEOC or the Texas Workforce Commission either;
- 12 right?

20

- 13 A. At that time, no.
- 14 Q. And why not?
- 15 A. Because my salary level was the same.
- 16 Q. Did you talk to the EEOC or Texas Workforce
- Commission about filing a charge at this time, just didn't 17
- 18 go forward or just didn't happen to --
- 19 A. I did not talk to them.
  - (Exhibit No. 10 was marked)
- 21 Q. I'm handing you what's been marked as Exhibit 10
- 22 and wonder if you've ever seen that. Have you seen this?
- 23 A. No. If I did see it, it would have been part of
- 24 the EEOC file; but I don't recall.
  - Q. This is a memo, I believe, that Miss McDonough

- 1 A. It's quite possible, yes.
  - 2 Q. "Mark advised that some of the turnover was
  - necessary to upgrade the staff." Did you say that? 3
  - 4 A. Yes, because I was told to start cleaning house;
  - 5 and that's the reason why some people were being exited.
    - Q. Who is exiting?
    - A. At this time I don't recall those employees, but
  - 8 I'm sure that the company has a list of who was terminated.
    - Q. And you said you were told. Who told you that?
  - 10 A. It was in a conversation when the client account
  - 11 services unit was turning into placement services unit. Dan
  - Yelich and I were present at a meeting with Miss McDonough 12
  - where we were told not to train any of the employees that 13
  - were not good performers in the new process, don't spend 14
  - 15 much time with them, give them the worst jobs and then they
  - will leave. And there was a management phone call with Bob 16
  - Bondi, Miss McDonough, and others, including John Gabel, 17

  - where we were told that Bob said, "Are we having" "Do 18
  - we have the wrong people in these departments?" 19
  - 20 Miss McDonough said, "We have the right people
  - 21 everywhere but except in placement services unit." 22 Q. Okay. Now, these people that were the wrong
  - people, were they just males or females or a mix or what? 23
  - 24 A. At this - I would say there's a mix. My
  - 25 department had more females in it than males.

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- Q. Why would you disagree? 17
- A. Because none of those issues had been brought to 18
- 19 my attention.
- Q. Well, they were here; right? I mean, you're 20
- saying this is the first time it was ever brought to your 21
- 22 attention?
- 23 A. Yes, it is. This is the first time I ever saw
- 24 this.
- 25 Q. And what do they mean by "the field"? What

a little bit? 17

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- 18 A. Yes, we did.
  - Q. That's the other e-mail we looked at --
- 20 A. That's correct.
- 21 Q. - a few minutes ago?
- 22 Do you believe that that was a problem, that you
- 23 were just now -- you were just now beginning to get the PSU
- 24 staff out to meet the syndicators?
  - A. The department had gone through a change in the

33 (Pages 126 to 129)

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Page 130

- 1 fall of the year. It was implemented October or November.
- 2 And 1-1 was a very large renewal date. So, taking people
- 3 out of the office in December would have been detrimental to
- 4 the workflow process on a large scale. So, after the 1-1
- 5 renewal date and then a lot of the background work gets done
- 6 in the month of January and then that's why Mark and I
- 7 started the process in February.
- 8 Q. Okay. Was anything done to Mark Oakley? Was he
- 9 demoted or terminated?
- 10 A. I don't know.
- 11 Q. Was it just as much his problem as your problem
- 12 that the PSU wasn't getting out to meet the syndicators?
- 13 A. It was it was a work a work issue between
- 14 the two groups. And it wasn't just in the Houston office.
- 5 It was other offices. And that's why the training program
- 16 also took place in Chicago.
- 17 Q. It says "We are well behind other sites in getting
- 18 this going." Do you know if that was true or not?
- 19 A. I don't.
- Q. Did she say that, though, in the -- the meeting?
- 21 A. I don't know.
- 22 Q. Then it says "We also discussed that of late Mark
- 23 has not been providing his team leads with early warning
- 24 reports regarding invoicing and therefore they are not
- 25 prepared each week to address why items have not been

- Q. "I also suggested he speak with the LA site about
- 2 possible job and finally if he wanted I would create a
- 3 separation package." Did she -- did she say those two 4 things?
  - A. Yes, she did.
- Q. So, was the LA site the reference to the moving to another position that you talked about as a third option?
- 8 A. Could have been, yes.
  - Q. Were there other opportunities besides moving to
- 10 LA?

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- 11 A. Yes, there was.
  - Q. "He expressed his desire to stay with Aon." Did
- 13 you say that?
- 14 A. Yes.
- 15 Q. "He is not interested in going back to claims."
- 16 Was that a discussion? I guess that's the LA role; is that
- 17 right?
- 18 A. That's not that's not correct.
- 19 Q. Okay. Was there another job open in claims or
- 20 something?
- 21 A. Not that I'm aware of. And and I don't recall
- 22 that statement.
- 23 Q. Was the -- the position that we talked about in
- 24 Exhibit 9, that was in claims; right?
- 25 A. Right. But I didn't have knowledge of that

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- l billed."
- 2 A. I didn't have any statistics to prove that that
- 3 statement's true.
- 4 Q. Did she say that in the meeting, though?
- 5 A. I don't know.
- 6 Q. Who would be your team leads that would have
- 7 needed that information?
- 8 A. Rachel Morales and Janice Stephens.
- 9 Q. So, they would know whether they were getting that
- 10 information or not?
- 11 A. They would know, correct.
- 12 Q. Do you know if they had gone to talk to Vicki
- 13 about those issues?
- 14 A. I don't know.
- 15 Q. "He agreed that he has dropped the ball in this
- 16 area recently." Did you say that?
- 17 A. No, I did not.
- 18 Q. So, you deny that that was discussed?
- 19 A. That's correct.
- 20 Q. And you deny that that happened?
- 21 A. That's correct.
- 22 O. "I have proposed that he move into an AD role in
- 23 CSU where I feel he could use his skills to be effective."
- 24 She did say that; right?
- 25 A. Yes.

- 1 communication.
- 2 Q. Okay. It says "I suggested he talk to Bob Bondi,
- 3 Dan Yelich" --
  - A. Yes.

4

- 5 Q. -- "and Larry DeBoer" --
  - A. Yes.
- 7 Q. -- "(LA) about the opportunities I mentioned."
- 8 Did she say that?
- 9 A. Yes.
- 10 Q. And did you do that?
- 11 A. I spoke with Bob. I spoke with Dan. And I cannot
- 12 recall whether or not I called Larry DeBoer or not.
- 13 Q. It says "He really wants to stay in PSU and have
- 14 more time to make it work. I told him that wasn't an option
- 15 since I don't have more time to work" -- "wait for
- 16 improvements and that the perception in the field is that he
- 17 doesn't have the skills to make this work." She says "I
- 18 told him that wasn't an option." Did she say that?
- 19 A. Yes
- 20 Q. Then it says "I told him I wanted his answer soon
- 21 before he takes vacation in the next week or so." Is
- 22 that --
- 23 A. Yes.
- 24 Q. accurate?
- 25 A. That is accurate.

1		l	
1	Page 150 Q. How long had you been working for her when you got	1	Page 152 Q. And what happened? Did you get did you do
2	this? Looks like maybe, what?	2	that?
3	A. Two months.	3	\
١.		1	
4	Q. It doesn't really stand out to me as anything	4	Q. Why not?
5	saying you're doing a great job or doing a bad job. It just	5	A. I don't know.
6	talks about goals; right?	6	Q. Do you know
7	A. Correct.	7	A. It was —
8	Q. Did you talk about these future directions and	8	Q. I'm sorry. Go ahead.
9	action plans and things like that?	9	A. It was shortly after that that I was told I was
10	A. I don't I don't recall.	10	being terminated.
11	Q. You did have a meeting with her. You just don't	11	Q. Was there a discussion about why you needed to
12	recall what you discussed?	12	take on the Florida unit?
13	A. I - I couldn't recall whether I actually	13	A. I believe they were trying to have all three
14	physically sat down and had a meeting or not.	14	assistant directors involved in the entire unit versus
15	Q. Did you have any discussions with Miss Parsley	15	having just my position being what it was.
16	about your performance at all during the time you worked	16	Q. What was your position?
17	with her?	17	A. Handling the communications, the call center part
18	A. No.	18	and the new business unit.
19	Q. Did she say you were doing a great job doing	19	Q. And why weren't you involved in the whole unit?
20	anything, a bad job doing anything, just neither way?	20	A. Well, I was involved in the whole unit; but those
21	A. I believe there — there was one e-mail in the	21	were the specific departments that I was responsible for.
22	packet that I provided that may have spoken to a positive	22	Q. How did that differ from the other assistant
23	performance.	23	directors?
24	O. What was that about?	24	A. The other assistant directors had units that
25	A. I don't recall right now. I'd have to look	25	reported directly to or supported direct offices in the
	in a don theen in the now. An unit to look		reported an early to or supported an ear offices in the
	Page 151		Page 153
1	through the pack.	1	other Aon offices.
2	Q. I don't know if I have seen that one. You don't	2	Q. And, so, there was a impression that you needed to
3	remember what it was about, though?	3	support an office directly?
4	A. I don't offhand.	4	A. I was asked if I would like to do that.
5	Q. When was the next thing that happened that changed	5	Q. But you never were told why you didn't get the
6	your employment in any way? Any other events that happened	6	Florida unit?
7	chronologically after this evaluation in August?	7	A. No.
8	A. Specifically meaning	8	Q. That's correct, you were never told?
9	Q. Did you have a discussion with her about any	9	A. I was never told why. I was terminated.
l .	you said you didn't have a discussion. When is the next	10	(Exhibit No. 15 was marked)
10	•	ì	,
11	thing that happened relating to your performance or your	11	Q. I'm handing you an e-mail which is marked
12	position?	12	Exhibit 15. Can you identify that document?
13	A. At one point they had asked about taking on some	13	A. This looks to be an e-mail from Donna Parsley to
14	additional responsibilities.	14	Miss McDonough.
15	Q. Tell me about that discussion.	15	Q. Have you seen this before?
16	A. I was asked to whether I would be interested in	16	A. I have not. Actually, I have seen this because I
17	taking on the Florida unit.	17	believe that this was let me see. I believe this was
18	Q. The Florida what?	18	part of the EEOC file.
19	A. The Florida unit.	19	Q. Let's kind of go over this. This this appears
20	Q. Okay. So, you were going to supervise the Florida	20	to be an e-mail dated October 30th, and it appears to be a
21	unit?	21	e-mail from Donna to Vicki talking about a meeting she had
22	A. I was asked if that would be something I was	22	with you on October 29th. Is that the same meeting that
23	interested in.	23	you we have just been talking about with the Florida
24	Q. And what did you say?	24	office or is that something different?
25	A. I said I'd be happy to do that.	25	A. Yes, this would be that same meeting.
		ALL DESCRIPTION OF THE PERSON	The second secon
N-MARION.			39 (Pages 150 to 153

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Page 154

Q. Donna says "I had a discussion with Mark the

- 2 morning of October 29, 2003. Mark and I discussed the
- 3 functions he was currently performing on a daily basis such
- 4 as AVX." What's that?
- A. I don't recall.
- 6 Q. Okay. "Assign" --
  - Some kind of internal database.
- 8 Q. "Assignment of LN10s." What's that?
- 9 A. Those were new business assignments. So, when a
- 10 new piece of business would come in, they would complete an
- 11 LN10; and then we would know that to work on a new piece
- 12 of business.

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- 13 Q. "Maintaining a new business spreadsheet and
- 14 transition meetings, fielding team issues for Client
- 15 Connection and the New Business team (6 people)." Is that
- 16 an accurate description of what you were doing at that time,
- 17 those different things?
- 18 A. Yes.
- 19 Q. She continues on, "He is running open inventory
- 20 reports, usually once a week, LN30 reports once or twice a
- 21 month and performs the analysis for the field office reports
- 22 with contribution from Kim and Tracie for all of the
- 23 commentary. In addition, I reiterated that his help was
- 24 also required daily in the CSU que per our last AD meeting."
- 25 A. Okay.

## A. That's true.

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- Q. "We were still pursuing a way to more equally
- 3 distribute the internal teams and assignment of field
- 4 offices." Is that accurate or was that discussed?
- 5 A. I would say that's accurate.
- 6 Q. "We discussed that the current structure was not
- 7 providing enough relief to Tracie Jones's team, the largest
- 8 with 23 staff members, and not positively affecting CSU to
- 9 the fullest degree." Did she talk about that with you?
  - A. Yes.
- 11 Q. "I stated that we were finding it difficult to
  - carve out enough administrative and report functions within
- 13 CSU to (1) afford him a full work load and (2) make a
- 14 positive impact on the AD's duties." Is that right?
  - A. Yes.
- 16 Q. She ends "Furthermore, the current structure was
- 17 not benefiting the department in the long run since all
- 18 three team leads could not equally divide staff, field
- 19 offices and department functions nor fully support each
- 20 other." Was that accurate?
- 21 A. Yes.
- 22 Q. "I asked Mark if he had a decision" -- "desire" --
- 23 I'm sorry. Let me start over. "I asked Mark if he had a
- 24 desire to and felt that he could take another team (possibly
- 25 the Florida field offices and team) and effectively handle

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- 1 Q. Is that an accurate description of what she said
- 2 to you?
- 3 A. I would say "yes."
- 4 Q. Then it goes on to say that she advised you "that
- 5 we were continuing to review the current situation with CSU
- 6 in regard to balancing work loads for the three ADs as 'the
- 7 current situation was just not working." Did she say that?
- 8 A. I don't know if those were her exact words.
- 9 Q. But there was some discussion, you already
- 10 mentioned, about balancing the work loads or some ---
- 11 A. Yes
- 12 Q. something like that?
- 13 "Although the transition of the Dallas/Ft. Worth
- 14 team did not work out." What what's what's that all
- 15 about?
- 16 A. I have no idea. That's -- that's the first I saw
- 17 of it.
- 18 Q. Did they --
- 19 A. That was not discussed.
- Q. It implies that they were trying to transition the
- 21 Dallas-Fort Work -- Worth work to you.
- 22 A. That never happened. No discussion around that.
- 23 Q. At least that you're aware of. Maybe maybe
- 24 they were talking about it, but you weren't aware of it or
  - 5 something like that?

- 1 the field office staff, accounts and team issues." And
- 2 we've already mentioned that that was discussed; right? Is
- 3 that right or not?
  - A. Yes, Florida was mentioned, yes.
- 5 Q. "He said that this was not an option, I was the
- 6 Director and he would do" -- "He said that this was not an
- 7. option." Did you say that?
- 8 A. I did not say that.
  - Q. Do you know why she would say that if you didn't
- 10 say that?

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- 11 A. I do not know why.
- 12 Q. Miss Parsley continues, "I was the Director and he
- 13 would do whatever we determined was best for CSU. I also
- 14 asked if he intended to remain in his current position for a
- 15 while and again he stated, this was not an option."
  - A. That -- I did not make that statement.
- 17 Q. That implies that you were unhappy and wanted to
- 18 move someplace else? I mean, is that -- is that what is
- 19 implied here?
  - A. I don't know. I didn't make this statement.
- Q. Okay. So, you wanted to stay in the position?
  - A. Yes, I did.
- 23 Q. "He said that he had performed so many duties
- 24 since joining Aon that it really did not matter; he would do
- 25 whatever was asked of him." Did you say that?

1	Page 158		Page 160
1	A. I said I would do whatever she asked me to do,	1	by "it was not working out"?
2	yes.	2	A. No.
3	Q. "I asked Mark if there were any past or present	3	Q. Did Ms. Parsley say anything during the meeting?
4	issues with any of the Florida offices, Atlanta, Nashville	4	A. Not that I recall.
5	or Richmond and he said there were none known to him." Is	5	Q. Did Mr. Joyner say anything during the meeting?
6	that accurate?	6	A. No, not that I recall.
7	A. Correct. I wasn't aware of any issues with those	7	Q. Was it unusual to have another member of
8	offices.	8	management and an HR person in a termination meeting?
9	Q. "Mark did request that if he was granted another	9	A. No, it was not unusual.
10	team that he not continue to be primarily responsible for	10	Q. When you had terminated employees, were there
11	the CSU que on a daily basis." Is that accurate?	11	sometimes an HR person there?
12	A. I don't recall that.	12	A. Sometimes.
13	Q. Could have happened? You just don't know?	13	Q. Do you have any information about who was actually
14	A. I don't recall.	14	involved in the decision to terminate your employment?
15	Q. "I agreed and he commented that we needed to work	15	A. I do not have any information about that.
16	more with CSU staff to pull their daily work from the que."	16	Q. Do you have any information about the basis for
17	Is that did she say that?	17	the reason it wasn't working out?
18	A. She could have. I don't recall.	18	A. No.
19	Q. "The conversation ended and I advised Mark that I	19	Q. Did you take that temporary assignment?
20	had to discuss this issue further with Vicki McDonough to	20	A. I did.
21	determine what steps we needed to take and we would get back	21	Q. Tell me what you did.
22	to him shortly." Is that how the conversation ended?	22	A. I worked in the surplus lines unit.
23	A. Yes.	23	Q. Doing what?
24	Q. Did they get back to you shortly?	24	A. Work where you had to pull together information
25	A. Yes.	25	regarding what carriers were not available, what standard
<u> </u>		├	
		l .	
	Page 159	1	Page 161
1	Q. What did they say?	1	carriers were not available, and why they were placed with a
2	<ul><li>Q. What did they say?</li><li>A. They terminated me.</li></ul>	2	carriers were not available, and why they were placed with a surplus lines carrier for state filing purposes.
2 3	<ul><li>Q. What did they say?</li><li>A. They terminated me.</li><li>Q. Tell me how that happened.</li></ul>	2 3	carriers were not available, and why they were placed with a surplus lines carrier for state filing purposes.  Q. Did you was there any sort of announcement made
2 3 4	<ul> <li>Q. What did they say?</li> <li>A. They terminated me.</li> <li>Q. Tell me how that happened.</li> <li>A. I was called into an office. I was told things</li> </ul>	2 3 4	carriers were not available, and why they were placed with a surplus lines carrier for state filing purposes.  Q. Did you was there any sort of announcement made that you were moving or did you see anything from
2 3 4 5	<ul> <li>Q. What did they say?</li> <li>A. They terminated me.</li> <li>Q. Tell me how that happened.</li> <li>A. I was called into an office. I was told things</li> <li>weren't working out, and I was terminated. I could be – I</li> </ul>	2 3 4 5	carriers were not available, and why they were placed with a surplus lines carrier for state filing purposes.  Q. Did you was there any sort of announcement made that you were moving or did you see anything from Miss McDonough or Miss Parsley about you moving to another
2 3 4 5 6	<ul> <li>Q. What did they say?</li> <li>A. They terminated me.</li> <li>Q. Tell me how that happened.</li> <li>A. I was called into an office. I was told things weren't working out, and I was terminated. I could be — I could do a special assignment for a month in the surplus</li> </ul>	2 3 4 5 6	carriers were not available, and why they were placed with a surplus lines carrier for state filing purposes.  Q. Did you was there any sort of announcement made that you were moving or did you see anything from Miss McDonough or Miss Parsley about you moving to another position?
2 3 4 5 6 7	<ul> <li>Q. What did they say?</li> <li>A. They terminated me.</li> <li>Q. Tell me how that happened.</li> <li>A. I was called into an office. I was told things weren't working out, and I was terminated. I could be — I could do a special assignment for a month in the surplus lines department.</li> </ul>	2 3 4 5 6 7	carriers were not available, and why they were placed with a surplus lines carrier for state filing purposes.  Q. Did you was there any sort of announcement made that you were moving or did you see anything from Miss McDonough or Miss Parsley about you moving to another position?  A. Not that I'm aware of.
2 3 4 5 6 7 8	<ul> <li>Q. What did they say?</li> <li>A. They terminated me.</li> <li>Q. Tell me how that happened.</li> <li>A. I was called into an office. I was told things weren't working out, and I was terminated. I could be — I could do a special assignment for a month in the surplus lines department.</li> <li>Q. I can't remember exactly what you said. They</li> </ul>	2 3 4 5 6 7 8	carriers were not available, and why they were placed with a surplus lines carrier for state filing purposes.  Q. Did you — was there any sort of announcement made that you were moving or did you see anything from Miss McDonough or Miss Parsley about you moving to another position?  A. Not that I'm aware of.  Q. Did you work that entire month?
2 3 4 5 6 7 8 9	<ul> <li>Q. What did they say?</li> <li>A. They terminated me.</li> <li>Q. Tell me how that happened.</li> <li>A. I was called into an office. I was told things weren't working out, and I was terminated. I could be — I could do a special assignment for a month in the surplus lines department.</li> <li>Q. I can't remember exactly what you said. They called or you were called? Who called you in?</li> </ul>	2 3 4 5 6 7 8 9	carriers were not available, and why they were placed with a surplus lines carrier for state filing purposes.  Q. Did you — was there any sort of announcement made that you were moving or did you see anything from Miss McDonough or Miss Parsley about you moving to another position?  A. Not that I'm aware of. Q. Did you work that entire month? A. Yes, I did.
2 3 4 5 6 7 8 9	<ul> <li>Q. What did they say?</li> <li>A. They terminated me.</li> <li>Q. Tell me how that happened.</li> <li>A. I was called into an office. I was told things weren't working out, and I was terminated. I could be — I could do a special assignment for a month in the surplus lines department.</li> <li>Q. I can't remember exactly what you said. They called or you were called? Who called you in?</li> <li>A. Donna came over to my work space and asked me to</li> </ul>	2 3 4 5 6 7 8 9	carriers were not available, and why they were placed with a surplus lines carrier for state filing purposes.  Q. Did you was there any sort of announcement made that you were moving or did you see anything from Miss McDonough or Miss Parsley about you moving to another position?  A. Not that I'm aware of. Q. Did you work that entire month?  A. Yes, I did. Q. Then what happened?
2 3 4 5 6 7 8 9 10	<ul> <li>Q. What did they say?</li> <li>A. They terminated me.</li> <li>Q. Tell me how that happened.</li> <li>A. I was called into an office. I was told things weren't working out, and I was terminated. I could be — I could do a special assignment for a month in the surplus lines department.</li> <li>Q. I can't remember exactly what you said. They called or you were called? Who called you in?</li> <li>A. Donna came over to my work space and asked me to join her in the conference room. Ernie Joyner was present,</li> </ul>	2 3 4 5 6 7 8 9 10	carriers were not available, and why they were placed with a surplus lines carrier for state filing purposes.  Q. Did you — was there any sort of announcement made that you were moving or did you see anything from Miss McDonough or Miss Parsley about you moving to another position?  A. Not that I'm aware of. Q. Did you work that entire month?  A. Yes, I did. Q. Then what happened? A. My last day, I believe, was supposed to be one day
2 3 4 5 6 7 8 9 10 11	<ul> <li>Q. What did they say?</li> <li>A. They terminated me.</li> <li>Q. Tell me how that happened.</li> <li>A. I was called into an office. I was told things weren't working out, and I was terminated. I could be - I could do a special assignment for a month in the surplus lines department.</li> <li>Q. I can't remember exactly what you said. They called or you were called? Who called you in?</li> <li>A. Donna came over to my work space and asked me to join her in the conference room. Ernie Joyner was present, Vicki McDonough was present, and then she was present.</li> </ul>	2 3 4 5 6 7 8 9 10 11 12	carriers were not available, and why they were placed with a surplus lines carrier for state filing purposes.  Q. Did you was there any sort of announcement made that you were moving or did you see anything from Miss McDonough or Miss Parsley about you moving to another position?  A. Not that I'm aware of. Q. Did you work that entire month?  A. Yes, I did. Q. Then what happened?  A. My last day, I believe, was supposed to be one day the first week in December. The very last day I had jury
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Page 162 Page 164 Q. Were you looking for another job within Aon during Q. You have to answer orally. 1 1 2 that time? 2 A. Potentially. 3 A. No. 3 Q. And you never saw her speak harshly to any females Did you want another job within Aon? 4 4 on the staff? 5 A. If one was available, I would have - I would have 5 A. I did not see that, no. Q. Any other reason you believe it was because of a 6 taken that. 6 7 Q. Would it have been incumbent on Miss McDonough and 7 man that you were terminated? Miss Parsley to look for another job for you? A. Please repeat the question. 8 8 9 A. No. no. 9 Q. Yeah. I -- I'm just going to go through every reason you believe you were terminated because of your 10 Q. But you could have looked for one? 10 11 A. That was - that was one of the options. 11 gender. 12 They didn't give you an option of a severance 12 A. Okay. 13 package at this time? 13 Q. So, you said because men were spoken to harshly. 14 A. No. I was told that because it was a termination, Any other reason? 14 15 the position was going to be replaced. 15 A. I also said that my performance - I - I believe 16 Q. Did you have sort of an exit interview with that the statement why I was terminated is false. 16 17 Mr. Joyner? That it wasn't working out? 17 A. No. 18 18 That's correct. A. 19 Q. So, he was just in that meeting. And then you 19 Q. Or was there some other reason? 20 just started another job the next day you worked; right? 20 It was because of my gender. That was the reason. A. Why do you believe that it wasn't working out was 21 A. Correct. 21 Q. 22 Q. Why do you think the company terminated your 22 false? 23 employment? 23 A. Because I had no information to document 24 A. Because I was a male, I was discriminated upon, a 24 otherwise. 25 woman was given my job. And I disagree with the allegations 25 Q. Had you -- you had, however, talked -- had Page 165 why I was terminated. And other men had been fired too. received information from Miss McDonough that there was 1 Q. Okay. Let me -- let me go through each one of 2 problems, at least that she felt; right? 2 MR. FIDDLER: Objection, form. 3 3 those. Why do you think you being male was a factor in your Q. (BY MR. NOTESTINE) In the meeting that we looked 4 decision? 5 at before when she demoted you, there was some discussions 5 A. Because men were spoken to in a hostile manner. Q. Who did that? about problems; right? 6 6 A. Yes, there was discussions about problems. 7 A. Miss McDonough. 7 8 Q. Who did she speak to in a hostile manner? 8 Q. Had those been resolved, to your knowledge? 9 A. I was demoted. I don't agree that -- that there A. I would say I was spoken to in a hostile manner. 10 Dan Yelich was spoken to in a hostile manner. John Gabel --10 were problems. Q. Dan Yelich? O. Anything else that supports that the reason given 11 11 12 John Gabel was also spoken to in a hostile manner. 12 for your termination was false other than your disagreement? Anything else that you can use to support that the actual 13 Q. Did she ever speak to women in a hostile manner? 13 reasons were false? 14 A. I don't know. I didn't - I don't recall seeing 14 15 A. I don't have any documentation that would show I 15 that. Q. How do you know that Dan and John -- Dan Yelich 16 did a bad job. 16 Q. You mentioned other men were terminated --17 17 and John Gabel were spoken to in a hostile manner? 18 A. Yes. 18 A. Because I was in meetings with them at the time. 19 Was it, like, a staff meeting where there's a 19 -- is another reason. Who else was terminated? bunch of people or just you and them and her or what? 20 A. John Canter was terminated. And Bob Hamilton 20 21 A. Staff meetings. 21 was - quit because, from my understanding, Miss McDonough would not speak to him after - sometime after his Q. So, other people would have seen this? 22 22 23 A. Uh-huh. 23 employment. So, he quit to take a different job. O. So, Bob was moved to another position? 24 24 Yes? Q. 25 Potentially. 25 A. No. He left the company.

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	Page 166		Page 168
1	Q. Okay. So, he was never demoted or moved to	1	Canter.
2	another position. He just left the company?	2	Q. Okay. These are the other people you mentioned
3	A. That's correct.	3	already?
4	Q. Canter had moved to another position?	4	A. Yes.
5	A. That's correct.	5	Q. At the time of your termination, though, you were
6	Q. Is he still with the company?	6	assistant director. Do you know what the the demographic
7	A. I don't know.	7	breakdown was from the time you began as assistant director
8	Q. To your knowledge, was he ever terminated?	8	until the time you ended?
9	A. He was terminated from the director's position,	9	A. I don't right now, no.
10	yes.	10	Q. I assume there would have been many more than four
11	Q. Moved out of her group into somebody else's group?	11	assistant directors; is that right?
12	A. That's my understanding.	12	A. In the entire – yes.
13	Q. But still with the company at least at that point?	13	Q. Group? Okay. Do you know who replaced you when
14	A. Yes.	14	you when you were terminated?
15	Q. Had she ever terminated any females?	15	A. I believe her name was Rochelle Simone.
16	A. I don't know.	16	Q. How do you know that?
17	Q. Well, you told me before that she told you to	17	A. Because I took the special assignment and I was
18	terminate assistant director Mary Marye Ann Turner;	18	still employed there at the time.
19	right?	19	Q. Do you have any knowledge of her qualifications?
20	A. Marye Ann Tucker. I terminated Marye Ann Tucker.	20	A. I don't believe that she has a advanced degree.
21	Q. Okay. But you said that you that she came in	21	Q. Any knowledge about her experience or insurance
22	and just told you to fire her?	22	background or anything like that?
23	A. Yes. And she was present and she was present	23	A. All I understand is she had worked for the company
24	at the firing.	24	before, but I don't know. She had been out of the - she
25	Q. So, that's one female. Any other females that she	25	had never been involved in the Aon client services.
<u> </u>		<del> </del>	
-	Page 167	-	Page 169
1	terminated, to your knowledge?	1	Q. Do you know what her salary was when she was
2	terminated, to your knowledge?  A. I don't have any knowledge.	2	Q. Do you know what her salary was when she was hired?
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	Page 182		Page 184
1	Does that somehow demonstrate you were discriminated against	1	Q. Okay. Do you know if other people got performance
2	based on your gender?	2	reviews?
3	A. No.	3	A. I do not know.
4	Q. "On 11/6/2003 Donna Parsley called me at home to	4	Q. Now, certainly your supervisors talked to you
5	say that they hired a woman to replace me and she would be	5	about concerns they had about your performance, didn't they?
6	sitting at my desk when I returned." And we've we've	6	A. Specifically
7	talked about that; right?	7	Q. Donna didn't Vicki McDonough talk about
8	A. Yes.	8	problems she was having with you when she demoted you?
9	Q. Okay. Then "What did your race, color, national	9	A. In her opinion that was it, yes.
10	origin, religion, sex, age, or disability, have to do with	10	Q. There were people that talked to you. Are you
11	the action taken against you?"	11	referring to some specific document when you say "negative
12	"Allegation #1: In 2001 their [sic] were four	12	counseling report"?
13	male Directors. Vickie" and we've talked about those	13	A. Yes.
14	four people; right?	14	Q. What's a negative counseling report?
15	A. Yes.	15	A. There was no performance appraisal or a counseling
16	Q. "Vickie McDonough became the Managing Director in	16	report filled out to document poor performance.
17	early 2002, and by November 2003 only one male Director	17	Q. Does Aon have a document that says at the top
18	remained." And that was Dan Yelich; right?	18	"Negative Counseling Report" or something like that?
19	A. Yes.	19	A. I don't recall.
20	Q. We've talked about that already; right?	20	Q. I'm just wondering if you do you mean a
21	A. Yes, we have.	21	specific document that you never got or if that is something
22	Q. "The remaining male Director is age 47+." Is that	22	different than the discussions that you've had with your
23	the 47-year-old we're talking about?	23	supervisors?
24	A. No. If you - if you're familiar with the form,	24	A. Well, a specific document would be a performance
25	it's a form you would just circle what applies to you.	25	appraisal, which was a standardized appraisal throughout the
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	Page 183		Page 185
1	Q. Okay. So, the only people that could fill out	1	Page 185
1 2	Page 183 Q. Okay. So, the only people that could fill out that form were people that are born on	1 2	_
	Q. Okay. So, the only people that could fill out		country.
2	Q. Okay. So, the only people that could fill out that form were people that are born on	2	country.  Q. Okay. It says "My last merit increase was on
2	<ul> <li>Q. Okay. So, the only people that could fill out that form were people that are born on</li> <li>A. No. The form</li> <li>Q October 30th, 1952?</li> </ul>	2	Q. Okay. It says "My last merit increase was on April 1st, 2003 and was reflective of the company's standard
2 3 4	<ul> <li>Q. Okay. So, the only people that could fill out that form were people that are born on</li> <li>A. No. The form</li> <li>Q October 30th, 1952?</li> <li>A. No. The the options are preprinted, and you</li> </ul>	2 3 4	Q. Okay. It says "My last merit increase was on April 1st, 2003 and was reflective of the company's standard increase."
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Case 4:05-cv-03437 Document 31-2 Filed on 07/14/06 in TXSD Page 22 of 30 Page 190 Page 192 statement or anything like that from them? 1 A. Yes. A. I don't remember. 2 Q. Let's skip down a little bit. At the very bottom Q. And I'm not going to go over the details of this. 3 paragraph it says "Four weeks later on May 5th, 2003, They basically describe the facts, and they said the Ms. McDonough informed me that she no longer wanted me in evidence was insufficient to establish a violation. Did you 5 the position and my options were to take a demotion to follow up with them in any way? 6 Assistant Director of the Client Services Unit or to accept A. Yes. I sent a -- well, yes. 7 a severance package. Knowing that Donna Parsley, Director Q. Okay. Well, tell me what you did after you 8 of Document Production" -- it sounds like a lawyer's job -received this. 9 "was going to be appointed to Director of CSU, I inquired A. I filed a -- a request with the EEOC to review the 10 into being the Director of Document Production. Ms. McDonough told me 'you wouldn't want that position' and 11 (Exhibit No. 19 was marked) 12 I couldn't have it because Miss Parsley had 'raised the bar' Q. Hang on. I'm handing you what's been marked 13 and the position required someone with many years of Exhibit 19. Is that the next thing you did, Exhibit 19 insurance experience." We have already talked about that; 14 15 right? Oh, yes, that's correct. So -- so, I answered. 16 A. Sort of point, counterpoint? Did Miss Parsley have many years of insurance 17 Q. A. Wait. That's correct. It was in response to this experience? 18 A. I don't know. 19 document. Q. So, you sent it back to the Texas Workforce 20 "I later learned that Ms. McDonough appointed Commission Civil Rights Division and sort of --21 Kimberley Overgoner to the position, a woman, and she had 22 not completed any education beyond a High School Diploma, A. Yes, that's correct. Q. Let's look at a couple things in here. At the top 23 and she had no insurance experience." We've already talked of Page 2 we've already talked about Marye Ann Tucker? 24 about that; right? A. Yes. 25 A. Yes. Page 191 Page 193 Q. I want to read the last sentence. "Following MR. FIDDLER: Kerry, when you get to a 1 breaking point, we can just take a break. I need to talk to Miss McDonoho's [sic] instructions I terminated Miss Tucker 2 on June 28, 2002 with great reservations as Miss Tucker had my legal assistant before she leaves. So, in the next ten never been written up or counseled and her previous minutes or something. performance appraisal was satisfactory." I don't think you 5 MR. NOTESTINE: Okay. Let me just finish mentioned that she had never been written up or counseled this document. It will just take a minute. and her previous employment appraisal was satisfactory. 7 Q. (BY MR. NOTESTINE) The next paragraph deals Were you specifically aware of that? Did you, like, look at 8 somewhat with some disputes, and I want to kind of identify a couple sentences I don't think we have talked about. In her file or something? the middle of the paragraph it says "In response to your 10 Who gave it to you? Was it HR or something? letter, the statement that the Dallas field office objected 11 12 to the reassignment of the Dallas office to me is false." A. Yes. 13 Is that accurate? A. I had no knowledge that they had objected to 14 reassignment of their office to me. I was not aware that 15 Q. How did you know that? 16 that was even an option. 17

10 A. Yes. I was given her performance appraisal.

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6 7 file.

there?

A.

13 Q. And were you aware that she had never been written

up or counseled? 14

15 A. Yes.

16

17 A. It wasn't in her file.

Q. Okay. But yet, nevertheless, Miss McDono -- Miss 18

McDonoho [sic] ---19

20 MS. McDONOUGH: McDonough.

MR. NOTESTINE: McDonough. Sorry. 21

22 Q. - told you to terminate her?

A. Yes. 23

24 Q. And she was an assistant director, just the same

position that you held when you were terminated; right?

Q. Well, why would you know it was false if you 18 didn't know about that?

19 A. Because we had talked about the Florida unit, not 20 the Dallas office.

21 Q. Was there -- so, there could have been discussion about the Dallas office objecting to the reassignment of the 22

Dallas office to you that you wouldn't have known about; 23

right? 24

25

A. Potentially.

49 (Pages 190 to 193)

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1

- 1 Q. Nevertheless, you said it was false; right?
- 2 A. Yes.
- 3 Q. Near the end of the paragraph it says "The
- 4 allegation that the field office rejected the reassignment
- of their unit to me based on their experience with me as
- 6 Director of PSU is also false because I let Peter McKenzie,
- 7 the head of the Dallas office and his Associate, Annie
- 8 McCarly, hand pick the Specialists they wanted to work on
- their team to ensure their satisfaction." What's that all
- 10 about?
- 11 A. I let them pick the exact employees that they 12 wanted to work on their work.
- 13 Q. Okay. Well, why would that mean that they weren't
- 14 upset about your performance?
- 15 A. It just says that I let them hand pick who they 16 wanted. So, they got to pick the exact employees that they
- 17 wanted.
- 18 Q. Okay. The next paragraph says "On October 13,
- 19 2002, I met with Miss McDonough at her request. She stated
- that when she offered me the position as Assistant Director 20
- 21 of CSU it was with the understanding that I would remain at
- 22 the same salary without the opportunity for merit increases
- or a bonus." Was that discussed? 23
- 24 A. Yes.

1

Q. Tell me what that discussion was. 25

- A. No.
- 2 Q. I don't have time to go over everything in here;
- but I'm skipping over to Page 4 of this document, sort of 3
- the third full paragraph. You refer there to your
- 5 performance -- well, that whole paragraph says "On March 26,
- 2003 during a meeting held by Joe Propati, the Managing
- 7 Director who filled in for Miss McDonough while she was on
- 8 sick leave, he outlined the fact that PSU was understaffed
- by 13 employees where PMU was only short one employee 9
- 10 (Exhibit 13). The evidence shows that given the shortage of
- 11 allocated staff for my department, my performance was still
- 12 on par with that of my peers. Was Joe Propati criticizing
- 13 you because you were understaffed?
  - A. No.

14

- 15 What did -- how did this show that you were on par Q. 16 with your peers that you had 13 fewer employees?
- 17 A. There is an LN40 report that's contained in the 18 documents that were provided that shows -- and it's in this
- 19 letter -- that shows that my performance based on those
- 20 documents was just as good, if not better than the other
- 21 three service centers.
- 22 O. Why would an LN40 report show that? And I don't
- 23 think I have seen that.
- 24 A. It -- it shows --
- 25 Q. Does it list your performance evaluations or

Page 195

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4

- A. I was told that when I took the demotion that I would be capped, salary capped.
- 2
- 3 Q. Why was that?
- 4 A. Because it was higher than, I guess -- I don't
- 5 know why.
- 6 Q. Was there -- was there salary bands and you could
- 7 only go up a certain --
- 8 A. Yes.
- 9 Q. - amount in a particular position?
- 10 A. Yes.
- 11 Q. Then it says "She stated she had a conversation
- with Human Resources and, according to Miss McDonough, they 12
- .13 expressed a concern that my salary was much higher than the
- 14 two other Assistant Directors in CSU. She stated that it
- 15 may pose a problem because I was a man and the other
- Assistant Directors were women." Did she talk -- say that 16
- 17 to you?
- 18 A. Yes, she did.
- 19 Q. Is that the complete extent of the conversation?
- 20 A. Yes, it is.
- Q. And this was October 13, 2002 and it related to 21
- 22 why your salary was capped; right?
- 23 A. Yes.
- 24 Q. Do you believe you - your salary was capped as -
  - was discriminatory towards you?

- something?
- 2 A. For your unit as far as whether or not you meet
- the goals for getting those LN40s taken care of. 3
  - Q. What is PMU?
- 5 A. Policy management unit.
- This paragraph says "Miss Patin's performance 6
- however, was significantly worse than that of her peers
- while her department was appropriately staffed." Were her 8
- 9 peers --
- 10 A. It was based on those -- go ahead.
- 11 Q. Were her peers you? Does that include you or is
- that somebody else? 12
- A. Yes, it includes me. I apologize. No. That 13
- 14 includes the other directors with a similar position that
- 15 she had in the other three service centers.
- Those are people around the country? 16
- 17 A. That's correct.
- Are those males or females? 18 O.
- 19 I don't know.
- 20 "Although Miss Patin seemingly had more brokerage
- experience than me." Why would you say that? 21
  - A. She had worked for Aon for a very long time.
- 23 "Given her poor performance as Director of PMU it
- 24 would be difficult to propose that she was more qualified
- and would be more successful than me as the Director of 25

Page 178 1 PSU." And that's that LN40 you were talking about right? 2 A. Correct. 3 M. NOTESTINE: Okay, Let's take a break. 4 THE VIDEOGRAPHER: Going off the record. 5 The time is 5:37 p.m. 6 (Recess taken) 7 (Echibit No. 20 was marked) 8 THE VIDEOGRAPHER: We are back on the 9 record. The time is 4:14 p.m. This is Tape No. 3. 10 Q. (BYM. NOTESTINE) Mr. Haasea, I'm handing you ill what's been marked as Exhibit 20. Can you identify that, 2 please? 11 do not be the extend that they give you with 16 these blanks, and you just kind of go in there and fill 16 these blanks out? I shat what they do? 13 A. Yes, This is the lawsuit paperwork that 1 14 completed at the federal court. 15 Q. Do they have some sort of form they give you with 16 these blanks, and you just kind of go in there and fill 16 these blanks out? I shat what they do? 19 Q. I believe we have talked about all the factural 20 allogations in hore to the extent that there are 24 any factual allegations, it's pretty sparse. Lock at No. 5. 25 It says on the date of July 12, 2005 you received a right to 2. 2 Q. (SYM. NOTESTINE) To the extent that there are 24 any factual allegations, it's pretty sparse. Lock at No. 5. 25 It says on the date of July 12, 2005 you received a right to 2. 3 A. Yes, 1dd. 4 Q. Vou got one from the EEOC. And that was a different form 2 than you got those from the EEOC was on 1 July 12th? 5 A. Yes, 4 Q. You got one from the EEOC was on 1 July 12th? 5 A. Yes, 5 Q. Do they have once of the better from the EEOC was on 1 July 12th? 5 A. Yes, 6 Q. And the one you got from the EEOC was on 1 July 12th? 5 A. Yes, 6 Q. And the one you got from the EEOC was on 1 July 12th? 5 A. Yes, 6 Q. And the one you got from the EEOC was on 1 July 12th? 5 A. Yes, 6 Q. And the one you got from the EEOC was on 1 July 12th? 5 A. Yes over the last page of this document. 15 discreted "Yef" or "No." Is there some reason why ou didn't she when you found the twee and the one you found the twere a plant is not one when did you found the were a place on the civil onc	Į.			<del></del>
2 A. Correct. 3 MR. NOTESTINE: Okay. Let's take a break. 4 THE VIDEOGRAPHER: Going off the record. 5 The time is 3:57 pm. 6 (Recess taken) 7 (Exhibit No. 20 was marked) 8 THE VIDEOGRAPHER: We are back on the 9 record. The time is 4:14 pm. This is Tape No. 3. 10 Q. (BY MR. NOTESTINE) MF. Hansen, The handing you is that where the completed at the federal court. 11 worker's beam marked as Exhibit 20. Can you identify that, please? 13 A. Yes. This is the lawsuit paperwork that I 14 completed at the federal court. 15 Q. Dute hyave some sort of form they give you with 16 these blanks, and you just kind of go in there and fill 17 these blanks our? Is that what they do? 18 A. Yes, they do. 19 Q. Ibelieve we have talked about all the factual 20 allegations in here to the extent that they have any. 21 THE REPORTERS Excuses me? 22 MR. NOTESTINE: Factual allegations. 23 Q. (BY MR. NOTESTINE) To the extent that there are any factual allegations, terry sparse. Lock at No. 5. 25 It says on the date of July 12, 2005 you received a right to 2 to letter from the EEOC. And that was a different form 2 than you got from the TWC; right? 2 A. Yes. 3 Q. You got one from both cuttics; right? 3 A. Yes. 4 Q. You got one from both cuttics; right? 5 A. Yes. 5 Q. I want to make sure that's right as opposed to that's wheny ugo the cone from the EEOC. 11 A. No, that's the one from the EEOC. 12 Q. Let's go over the hat speed of this document. 15 step over the hat speed of this document. 15 step over the hat speed of this document. 15 step over the hat speed of this document. 15 step over the hat speed of this document. 15 step over the hat speed of this document. 16 step over the hat speed of this document. 17 says "CHECK YES" and it says "URV DEMAND" and three's and 18 elecked "Yes" or "No." 18 there some reason why you didn't as ske'r a lynd meand in you employment discrimination complaint. And there's a plose on the city of the complay o			١.	
MR. NOTESTINE: Clasy. Lefs take a break.  The time is 3:57 p.m.  (Recess taken)  (Recess taken		· · · · · · · · · · · · · · · · · · ·	1 -	
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5 The time is 3:37 p.m. 6 (Recess taken) 7 (Exhibit No. 20 was marked) 8 THE VIDEOGRAPHER: We are back on the 9 record. The time is 4:14 p.m. This is Tape No. 3. 10 Q. (BY MR. NOTESTINE) Mr. Hansen, I'm banding you live what he told you, but when did you secure Mr. – I'm not going to ask you what he told you, but when did you secure Mr. please? 13 A. Yes. This is the lawsuit paperwork that I completed at the federal court. 15 Q. Do they have some sort of form they give you with the these blanks, and you just kind of go in there and fill 17 these blanks, and you just kind of go in there and fill 17 these blanks, and you just kind of go in there and fill 18 A. Yes, they do. 18 A. Yes, they do. 19 Q. Do'live we have talked about all the factual 20 allegations in here to the extent that they have any. 21 THE REPORTER: Excuse me? 22 Q. (BY MR. NOTESTINE) To the extent that there are any factual allegations; for the setting that they have any. 22 any factual allegations; for the setting that they have any. 23 A. Yes. 24 any factual allegations; for the setting that there are any factual allegations; for the setting that was a different form that there are any factual allegations; for the setting that there are any factual allegations, if spretty sparse. Look at No. 5. 25 It says on the date of July 12, 2005 you received a right to 20 Q. And why — why would that make any difference? 24 A. Yes. 25 Q. And the one you got from the EEOC. And that was a different form that you got the one from both eatities; right? 3 A. Yes. 4 Q. You got one from both eatities; right? 4 A. Yes. 5 Q. And the one you got from the EEOC was on July 12th? 5 A. Yes. 6 Q. And the one you got from the EEOC was on July 12th? 6 A. Yes. 7 Q. Did you — when did you decide you wanted a jury in this case? 8 Q. Very R. NOTESTINE) Are you refusing to answer 19 you decide you wanted a jury in this case? 9 M. Fiddler?  6 A. Yes. 7 Q. Did you — when did you decide you wanted or terminated by the company? I think we talked about Marye 19 you decide you wanted	Ι.	· · · · · · · · · · · · · · · · · · ·	1	
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THE VIDEOGRAPHER: We are back on the record. The time is 414 p.m. This is Tape No. 3.	1	-	-	* * * *
the Vine is 4:14 p.m. This is Tape No. 3, 10 Q. (BY MR. NOTESTINE) Mr. Hansen, I'm handing you live higher as below that the pole of Mr. Fiddler's help?  Mr. Fiddler's help?  Mr. Fiddler's help?  Mr. Fiddler's help?  Logowith the below that the below the pole of Mr. Fiddler's help?  Did you make any attempts to serve the company before you scurred the help of Mr. Fiddler?  Did you make any attempts to serve the company before you secured the help of Mr. Fiddler?  Mr. Fiddler's help?  A. No.  Did you make any attempts to serve the company before you secured the help of Mr. Fiddler?  A. No.  Will yn ot?  A. No.  Because you had to get the EEOC file.  Q. So, you file the lawsuit so you could go back and get the EEOC file.  A. Yes, did.  Q. And why — why wolld that make any difference?  A. Pes, did.  A. Yes, did.  A. Yes.  A. Yes.  A. Yes.  A. Yes.  A. Yes.  Q. And why — why wolld that make any difference?  A. Yes.  A.	1 .	,	1 ~	
9 record. The time is 4-14 p.m. This is Tape No. 3. 10 (Q. (BY MR. NOTESTINE) Mr. Hansen, I'm handing you what's been marked as Exhibit 20. Can you identify that, 12 please? 13 A. Yes. This is the lawsuit paperwork that I to completed at the federal court. 14 completed at the federal court. 15 (D. Do they have some sort of form they give you with these blanks, and you just kind of go in there and fill 17 these blanks out? Is that what they do? 18 A. Yes, they do. 19 Q. I believe we have talked about all the factual allegations in here to the extent that they have any. 21 THE REPORTER: Excuse me? 22 MR. NOTESTINE: Factual allegations. 23 Q. (BY MR. NOTESTINE) To the extent that there are 24 any factual allegations, it's pretry sparse. Look at No. 5. 25 It says on the date of July 12, 2005 you received a right to 2 time you got from the TWC; right? 26 A. Yes. 27 Q. I want to make sure that's right as opposed to 10 tharts when you got from the EEOC was on 7 July 12th? 28 A. Yes. 29 Q. I want to make sure that's right as opposed to 10 tharts when you got of the one from the TWC. 11 A. No, that's the one from the EEOC. 12 Q. Let's go over the last page of this document. 13 Hs a civil cover sheet. In orition right-hand corner where it 17 says 'CHECK YES' and it says 'JURY DEMAND' and there's not 6 checked 'Yes' or 'No.' Is there some reason why you didn't 3 the checked 'Yes' or 'No.' Is the resome reason why you didn't 3 the checked 'Yes' or 'No.' Is the resome reason why you didn't 3 checked 'Yes' or 'No.' Is the resome reason why you didn't 3 the checked 'Yes' or 'No.' Is the resome reason why you didn't 3 checked 'Yes' or 'No.' Is the resome reason why you didn't 3 checked 'Yes' or 'No.' Is the resome reason why you didn't 3 checked 'Yes' or 'No.' Is the resome reason why you didn't 3 checked 'Yes' or 'No.' Is the resome reason why you didn't 3 checked 'Yes' or 'No.' Is the resome reason why you didn't 4 che're and 1 che're	l	· · · · · · · · · · · · · · · · · · ·	1 '	1
10 Q. (BY MR. NOTESTINE) Mr. Harsen, Tm handing you with warks been marked as Exhibit 20. Can you identify that, 12 please?  13 A. Yes. This is the lawsuit paperwork that I completed at the federal court.  15 Q. Do they have some sort of form they give you with these blanks, and you just kind of go in there and fill the seed blanks, and you just kind of go in there and fill the seed blanks, and you just kind of go in there and fill the seed blanks, and you just kind of go in there and fill the seed blanks and the fill a lawsuit in order to get to a copy of the EEOC file.  14 A. Yes, 16 Q. O. And why - why would that make any difference?  25 It says on the date of July 12, 2005 you received a right to see what the full file looked like.  26 Q. Fresh and the fill file looked like.  27 Yes.  28 Q. You got one from the EEOC. And that was a different form the pro	8		8	· · · · · · · · · · · · · · · · · · ·
11 What's been marked as Exhibit 20. Can you identify that, 12 please? 13 A. Yes. This is the lawsuit paperwork that I completed at the federal court. 14 completed at the federal court. 15 Q. Do they have some sort of form they give you with these blanks, and you just kind of go in there and fill 17 these blanks out? Is that what they do? 18 A. Yes, they do. 19 Q. I believe we have talked about all the factual allegations in here to the extent that they have amy. 20 allegations in here to the extent that there are any factual allegations, it's pretty sparse. Look at No. 5. 21 THE REPORTER: Excuse me? 22 MR. NOTESTINE: Factual allegations. 23 Q. By MR. NOTESTINE) To the extent that there are any factual allegations, it's pretty sparse. Look at No. 5. 24 A. Yes. 25 It says on the date of July 12, 2005 you received a right to then you got from the TWC, right? 26 Q. And did that make a difference in what you did? 27 A. Yes. 28 Q. I want to make sure that's right as opposed to that's when you got then one you got then one you got then the EEOC. In the that's when you got then one from the EEOC. 29 Q. I want to make sure that's right as opposed to that's when you got then one from the TWC. 20 Q. Lot you wanted in the —in the employment discrimination complaint. And there's a place on the civil is says "C'HECK YES" and it says "I'URY DEMAND" and there's not checked "Yes" or "No." Is there some reason wity you didn't says "C'HECK YES" and it any "I'URY DEMAND" and there's not checked "Yes" or "No." Is there some reason wity you didn't says "C'HECK YES" and it any "I'URY DEMAND" and there's not checked "Yes" or "No." Is there some reason wity you didn't says "C'HECK YES" and it any "I'URY DEMAND" and there's not checked "Yes" or "No." Is there some reason wity you didn't says "C'HECK YES" and it any "I'URY DEMAND" and there's not checked "Yes" or "No." Is there some reason wity you didn't says "C'HECK YES" and it any "I'URY DEMAND" and there's not checked "Yes" or "No." Is there some reason wity you didn't says "C'HECK	9		9	Mr. Fiddler's help?
12   before you secured the help of Mr. Fiddler?	10	The state of the s	10	, i
A. Yes, This is the lawsuit paperwork that I  O. Do they have some sort of form they give you with these blanks, and you just kind of go in there and fill these blanks, and you just kind of go in there and fill A. Yes, they do.  O. I believe we have talked about all the factual allegations in here to the extent that they have any.  THE REPORTER: Excuse me?  MR. NOTISTINE: Factual allegations.  Q. What MR. NOTISTINE: Pactual allegations.  Gray MR. NOTISTINE: Pactual allegations.  Lisays on the date of July 12, 2005 you received a right to  sue letter from the EEOC. And that was a different form than you got from the TWC; right?  A. Yes.  Q. And did that make a difference in what you did?  Page 199  1 sue letter from the EEOC. And that was a different form than you got from the TWC; right?  A. Yes.  Q. Once you read what the company said, is that when you form the TWC; right?  A. Yes.  Q. And that's when you found Mr. Fiddler?  A. Yes.  Q. Did you — when did you decide you wanted a jury in file cover sheets or of at the bottom right-hand comer where it says "CRECK YES" and it says "ILRY DEMAND" and there's not checked "Yes" or "No." Is there some reason why you didn't says "CRECK YES" and it says "ILRY DEMAND" and there's not checked "Yes" or "No." Is there some reason why you didn't says "CRECK YES" and it says "ILRY DEMAND" and there's not checked "Yes" or "No." Is there some reason why you didn't says "CRECK YES" and it says "ILRY DEMAND" and there's not checked "Yes" or "No." Is there some reason why you didn't says "CRECK YES" and it says "ILRY DEMAND" and there's not checked "Yes" or "No." Is there some reason why you didn't says "CRECK YES" and it says "ILRY DEMAND" and there's not checked "Yes" or "No." Is there some reason why you didn't says "CRECK YES" and it says "ILRY DEMAND" and there's not checked "Yes" or "No." Is there some reason why you didn't says "CRECK YES" and it says "ILRY DEMAND" and there's not checked "Yes" or "No." Is there some reason why you didn't says "CRECK YES" and it says "ILRY	11	•	11	Q. Did you make any attempts to serve the company
14  CQ. Do they have some sort of form they give you with 15  Q. Do they have some sort of form they give you with 16  these blanks, and you just kind of go in there and fill 17  these blanks out? Is that what they do? 18  A. Yes, they do. 20  Q. Debieve we have talked about all the factual 20  allegations in here to the extent that they have any. 21  THE REPORTER: Excuse me? 22  MR. NOTESTINE: Factual allegations. 23  Q. (By MR. NOTESTINE) To the extent that there are 24  any factual allegations, it's pretty sparse. Lock at No. 5. 25  It says on the date of July 12, 2005 you received a right to 26  Q. And did that make a difference in what you did? 27  A. Yes. 28  Q. Vou got one from the EEOC. And that was a different form 29  than you got from the TWC; right? 30  A. Yes. 40  Q. You got one from the EEOC was on 41  July 12th? 41  A. No. Att's the one from the EEOC. 42  Q. Let's go over the last page of this document. 43  July 12th? 44  A. No, that's the one from the EEOC. 45  Q. Let's go over the last page of this document. 46  Cover sheet sort of at the bottom right-hand corner where it says "CHECK YES" and it says "ILNY EDMAND" and there's not discrimination complaint. And there's a place on the civil cover sheet. I notice that there is no reference to a juny demand in your employment discrimination complaint? 40  Q. Dod you - when ali jury is; right? 41  A. I was - I was pro se at that point, and I did not know what that asked for. 42  Q. You do lnow what a jury is; right? 43  A. Yes. 44  A. Yes, I do. 45  Q. On do lnow what a jury is; right? 46  A. Yes, I do. 47  Q. On one you read what the company? I when went to find a lawyer? 48  A. Yes. 49  Q. I want to make sure that's right as opposed to the says "INY EDMAND" and there's not to a jury demand in the - in the employment discrimination complaint. And there's a place on the civil cover sheet. I notice that there is no reason why you didn't ask for a jury demand in your employment discrimination complaint? 40  Q. Yeah. Anybody else that you're aware of? 4	12	please?	12	before you secured the help of Mr. Fiddler?
15 Q. Do they have some sort of form they give you with 16 these blanks, and you just kind of go in there and fill 17 these blanks out? Is that what they do? 18 A. Yes, they do. 20 I believe we have talked about all the factual 21 allegations in here to the extent that they have any. 22 MR. NOTESTINE: Factual allegations. 23 Q. (By MR. NOTESTINE) To the extent that there are 24 any factual allegations, it's pretty sparse. Look at No. 5. 25 It says on the date of July 12, 2005 you received a right to 26 Like. 27 A. Yes. 28 Q. And did that make a difference in what you did? 29 And did that make a difference in what you did? 20 And did that make a difference in what you did? 21 A. No. 22 than you got from the EEOC. And that was a different form 23 than you got from the TWC; right? 24 A. Yes. 25 Q. And the one you got from the EEOC was on 26 Q. And the one you got from the EEOC was on 27 July 12th? 28 A. Yes. 29 Q. I want to make sure that's right as opposed to 29 that they no got the one from the EEOC. 20 Let's go over the last page of this document. 21 If a civil cover sheet. I notice that there is no 22 complaint? 23 A. Yes. 24 A. Yes. 25 Q. And what's when you got the one from the EEOC. 26 Q. Let's go over the last page of this document. 27 So, you do'the EEOC file? 28 A. Yes, 1 did. 29 Q. And why — why would that make any difference? 29 Q. Let's go over the last was a different form 29 Q. Once you read what the company had said about the situation? 29 Q. And what's when you found Mr. Fiddler? 20 A. Yes. 21 A. No. 22 A. Yes. 23 Q. Once you read what the company said, is that when you then went to find a lawyer? 24 A. Yes. 25 Q. And that's when you found Mr. Fiddler? 26 A. Yes. 27 Q. Did you — when did you decide you wanted a jury in this case? 28 MR. FIDDLER: I'm going to instruct the witness not to answer. 29 Q. Let's go over the last page of this document. 20 (BY MR. NOTESTINE) Are you refusing to answer. 21 A. Yes. 22 Q. Are you aware of any females that were demoted or terminated by the company? I think we	13	A. Yes. This is the lawsuit paperwork that I	13	A. No.
16 these blanks, and you just kind of go in there and fill 17 these blanks out? Is that what they do? 18 A. Yes, they do. 19 Q. I believe we have talked about all the factual 20 allegations in here to the extent that they have any. 21 THE REPORTER: Excuse me? 22 MR NOTESTINE: Factual allegations. 23 Q. (BY MR. NOTESTINE) To the extent that there are any factual allegations, it's pretty sparse. Look at No. 5. 24 A. Because I wanted to see what the full file looked 21 like. 25 It says on the date of July 12, 2005 you received a right to 26 Like 20 Q. And did that make any difference? 27 A. Yes. 28 Use letter from the EEOC. And that was a different form 29 than you got from the TWC; right? 29 A. Yes. 29 Q. You got one from both entities; right? 20 Q. And the one you got from the EEOC was on 7 July 12th? 21 A. Yes. 22 Q. Let's go over the last page of this document. 23 Q. Let's go over the last page of this document. 24 drift served the company find a lawyer? 25 Lit's a civil cover sheet. I notice that there is no 15 distrimination complaint. And there's a place on the civil cover sheet sort of at the bottom right-hand corner where it 3 says "CHECK YES" and it says "JURY DEMAND" and there's not 7 says "CHECK YES" and it says "JURY DEMAND" and there's not 15 discrimination complaint. And there's a place on the civil 20 complaint? 21 A. I was —I was pro se at that point, and I did not 21 know what that asked for. 22 Q. You do know what a jury is, right? 23 Q. You do know what a jury is, right? 24 A. Yes, 1 do. 25 Q. Did you – did you notice there that they wanted 26 A. Yes. 27 Q. Did you – did you notice there that they anned 28 a copy of the EEOC file? 29 A. A dwh.y — why would that make any difference? 20 A. Because I wanted to see what the full file looked 21 like. 22 Q. What the company had asid about the situation? 23 Q. Von got one from the EEOC. 24 A. Yes. 25 Q. Once you read what the company had a sid about the situation? 25 Q. Vand that make a difference in what you did not what make any difference? 26 Q. An	14	•	14	Q. Why not?
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	Page 202		
1	A. No.	1	A. It was
2	Q. And you've told us the only ones you know the	2	bonus.
3	males you know of who were terminated; right?	3	Q. How d
4	A. Yes.	4	don't know. Is
5	(Exhibit No. 21 was marked)	5	average?
6	Q. I'm handing you what's been marked Exhibit 21.	6	A. It wou
7	And can you identify that, please?	7	Q. Would
8	A. This is a First Amended Complaint.	8	position, like,
9	Q. And this this was filed after you secured the	9	A. I don'
10	assistance of Mr. Fiddler; right?	10	Q. So, yo
11	A. Yes.	11	time in April
12	Q. Okay. I I kind of just want to make sure that	12	A. I don'
13	I have got all the information that you believe supports	13	Q. 15 was
14	your claims against Aon in this case. Okay?	14	A. I belie
15	A. Yes.	15	Q. And de
16	Q. Okay. So, let's turn to Page 2 of this document	16	people got in t
17	and okay. We're just going to go "STATEMENT OF CAUSES	17	A. I do n
18	OF ACTION." We're going to go down the list here. Okay?	18	Q. Then i
19	A. Yes.	19	or a written re
20	Q. Okay. I guess I haven't asked you that, but	20	had to receive
21	obviously you're here on video here. So, we know that	21	written warnin
22	you're a male; right?	22	A. No.
23	No. 6, "Hansen began working at AON Risk Services	23	Q. There
24	on May 3rd, 2001." And we've talked about that; right?	24	performance,
25	A. Yes.	25	looked at and
┢			
1	Page 203 Q. 7, "Hansen was a good performer and regularly	1	A. There
2	received merit pay increases and larger than average	2	Q. Why v
3	bonuses, and never received a written warning or written	3	A. Becau
4	reprimand."	4	Q. Okay.
5	A. Yes.	5	A. I was
6	Q. Okay. What evidence do you have that you were a	6	Q. Sort of
7	good performer?	7	A. No. G
8	A. The merit increases that I received.	8	Q. Did yo
9	Q. Okay.	9	A. No.
10	A. There was also some e-mails that were within the	10	Q. Your p
11	packet that said — comments that I had been a good — had	11	your performa
12	done a good job.	12	A. No.
13	Q. The stuff that you submitted to the TWC?	13	Q. That is
14	A. Yes. No. Yes. Yes.	14	A. My po
15	Q. Was there anything else other than what you	15	performance.
16	submitted to the TWC?	16	Q. Okay.
1	,	17	
17	A. No. No.	I	Services, there
18	Q. Okay. You then said you received merit increases.	18	
19	And I believe you got a merit increase in April of 2002;	19	that; right?
20	right?	20	A. Yes.
21	A. Yes.	21	Q. And yo
22	Q. And then one in April of 2003; right?	22	No. 9, "

	Page 204
1	A. It was if I recall correctly, it was a \$15,000
2	bonus.
3	Q. How do you know that was larger than average? I
4	don't know. Is that do you know that that's larger than
5	average?
6	A. It would be larger than the average person.
7	Q. Would it be larger than the average person at your
8	position, like, a director or -
9	A. I don't know that.
10	Q. So, you got didn't you get 10,000 the first
11	time in April of 2002?
12	A. I don't recall the specific bonuses.
13	Q. 15 was the second one?
14	A. I believe so.
15	Q. And do you know what you don't know what other
16	people got in that position; right?
17	A. I do not.
18	Q. Then it says you never received a written warning
19	or a written reprimand. Was there a specific form that you
20	had to receive in order to get a written reprimand or a
21	written warning?
22	A. No.
23	Q. There were things in writing about your
24	performance, though, right, like some of these e-mails we
25	looked at and things?
2, J	looked at and dinigs:
	Page 205
1	A. There are e-mails in this packet, yes.
2	Q. Why wouldn't that be a written reprimand?
3	A. Because they weren't shared with me.
4	Q. Okay.
5	A. I was not made aware of those documents.
6	Q. Sort of I'm sorry. Go ahead.
7	A. No. Go ahead.
8	Q. Did you receive oral warnings and oral reprimands?
9	A. No.
10	Q. Your position is you were never talked to about
11	your performance?
12	A. No.
13	Q. That is your position? That's not your position?
14	A. My position is I was not spoken to about my
15	performance.
16	Q. Okay. No. 8, "When Hansen began with AON Risk
17	Services, there were four male Directors in the Houston
18	Service Center including Hansen." We have talked about
19	that; right?
20	A. Yes.
21	Q. And you've identified those people; right?
22	No. 9, "In early 2002, Vicki McDona"
23	"McDonough, Managing Director, became Hansen's direct
24	supervisor." We talked about that; right?
	Super visor. The turned account the property of the property o

Yes.

25 bonuses. How do you know that?

Q. Okay. You said you got larger than average

25

Yes.

23

1 C. "While McDonough was Managing Director she terminated two of the male directors and a third resigned." 3 A. Yes. 4 Q. And we talked about that; right? 5 A. Yes. 6 Q. One's you. One's Mr. Canter that really transfererd; right? 8 A. I believe he was terminated from the position he was in. 10 Q. And the third resigned, and that was Bob? 11 A. Bob Hamilton. 12 Q. "McDonough replaced all three of these men with 13 fernales." Who replaced them, to your knowledge? I don't know whether I've asked you that. 15 A. Plesse repeat that. 16 Q. I don't think I've ever asked you that. 17 A. Plesse repeat that. 18 Q. Who — who replaced Canter? 19 A. I replaced Canter initially, and then Sharon Patin Proplaced Hansen to 24 the position of Assistant Director. Donan Parsley became 25 Hansen's direct supervisor." We have talked about that; right? 1 right? 2 A. Yes. 3 Q. I1, "Instead, McDonough gave the Director, Q. "The female who was given the job had no insurance experience at the time. Hansen had ine years." We have talked about that; right? 1 right? 2 A. Yes. 3 Q. I1, "Instead, McDonough gave the Director, Q. "The female who was given the job had no insurance experience at the time. Hansen had ine years." We have talked about that; right? 1 Q. "The female who was given the job had no insurance experience at the time. Hansen had ine years." We have talked about that; right? 1 Q. "The female who was given the job had no insurance experience at the time. Hansen had ine years." We have talked about that; right? 1 Q. "The female who was given the job had no insurance experience at the time. Hansen had ine years." We have talked about that; right? 1 Q. "The female who was given the job had no insurance experience at the time. Hansen had ine years." We have talked about that; right? 1 Q. Who re one on more to complete a special assignment." 1 We have talked about that; right? 2 A. Yes. 4 Q. Do you have any order, you know, life insurance? 5 A. Yes. 6 Q. Any other facts that support your belief that you were discriminated against				
2 terminated two of the male directors and a third resigned." 3 A. Yes. 4 Q. And we talked about that; right? 5 A. Yes. 6 Q. One's you. One's Mr. Canter that really 7 transferred; right? 8 A. I believe he was terminated from the position he was in. 10 Q. And the third resigned, and that was Bob? 11 A. Bob Hamilton. 12 Q. "McDonough replaced all three of these men with females with replaced from the position he was in. 14 know whether I've asked you that. 15 A. Please repeat that. 16 Q. I don't think I've ver asked you that. 17 A. Please repeat that. 18 Q. Who - who replaced Canter? 19 A. I replaced Canter initially, and then Sharon Patin replaced method by the position of Assistant Director. Donan Paraley. 21 Q. Who replaced Bob? 22 A. Donan Paraley. 23 Q. Q. 1Q. On May 5th, 2003, McDonough demoted Hansen to be experience at the time. Hansen had nine years." We have talked about that; right? 2 A. Yes. 3 Q. The female who was given the job had no insurance experience at the time. Hansen had nine years." We have talked about that; right? 4 A. Yes. 4 Q. No. 13, "on November 4th, 2003, McDonough 2 rough that the supervisor." We have talked him to tast yor for one month to complete a special assignment." In the supervisor or one month to complete a special assignment." In the supervisor of complete a special assignment." In the was going to be terminated, but asked him to stay on for one month to complete a special assignment." In the supervisor of complete a special assignment." In the very disc	_	<del></del>		Page 208
3 A. Yes. 4 Q. And we talked about that, right? 5 A. Yes. 6 Q. One's you. One's Mr. Canter that really 7 transferred, right? 8 A. I believe he was terminated from the position he 9 was in. 9 Q. And the third resigned, and that was Bob? 11 A. Bob Hamilton. 12 Q. "McDonough replaced all three of these men with 13 females." Who replaced all three of these men with 14 know whether I've asked you that. 15 A. Please repeat that. 16 Q. I don't think I've ever asked you that. 17 A. Please repeat that. 18 Q. Who – who replaced Canter? 19 A. I replaced Canter? 19 A. I replaced Canter? 20 A. Who — who replaced Bob? 21 Q. Who replaced Bob? 22 A. Dona Parsley. 23 Q. 10, "On May 5th, 2003, McDonough demoted Hansen to the position of Assistant Director. Donan Parsley became 24 the position of Assistant Director. Donan Parsley became 25 Hamsen's direct supervisor." We have talked about that; 26 A. Yes. 27 Q. "The female who was given the job had no insurance experience at the time. Hansen had nine years." We have support your belief that you were discriminated against in the termination of employment to the terminated that the terminated of the position of the torminated of the position of the torminated from the position of a best qualified female." That was Overgone? 4 A. Yes. 4 Q. I'l, "Instead, McDonough gave the Director, Donan Parsley became the time. Hansen had nine years." We have separed that was Overgone? 5 A. Yes. 6 Q. The female who was given the job had no insurance experience at the time. Hansen had nine years." We have separed to the time. Hansen had nine years." We have a wear of the time. Hansen had nine years." We have a wear of the time. Hansen had nine years." We have a wear of the time. Hansen had nine years." We have a wear of the time. Hansen had nine years." 6 Q. Po you have any other benefits you have in you think it's going to take before your — your franchise business that may have you lose?  9 A. No. 10 Q. Po you have any projections or anything? 11 Yes. 12 Q. Who was the time of the your point of t			1 "	
4 we've talked about all the facts that support that, haven't 5 A. Yes. 6 Q. One's you. One's Mr. Canter that really 7 transferred; right? 8 A. I believe he was terminated from the position he 9 was in. 10 Q. And the third resigned, and that was Bob? 11 A. Bob Hamilton. 12 Q. "McDonough replaced all three of these men with 13 females." Who replaced them, to your knowledge? I don't 14 know whether I've asked you that. 15 A. Please repeat that. 16 Q. I don't think I've ever asked you that. 17 A. Please repeat that. 18 Q. Who - who replaced Canter? 19 A. I replaced Canter initially, and then Sharon Patin 19 replaced me. 21 Q. Who replaced Bob? 22 A. Donna Paraley. 23 Q. Q. ("On May 5th, 2003, McDonough demoted Hansen to tell the position of Assistant Director. Donna Paraley became Hansen's direct supervisor." We have talked about that; right? 2 A. Yes. 3 Q. Il, "Instead, McDonough gave the Director, 4 Document Production job to a less qualified female." That 2 was Overgoner? 4 Q. "The female who was given the job had no insurance experience at the time. Hansen had nine years." We have talked about that; right? 4 Q. L2, "Then, on November 4th, 2003, McDonough 12 notified Hansen he was going to be terminated, but asked him to to stay on fir one month to complete a special assignment." 4 We have talked about that; right? 5 A. Yes. 6 Q. Any other facts that support your belief that you 17 were discriminated against in the termination of employment of the work was the was the alled about that right? 5 A. No. 6 Q. Q. Any other facts that support your belief that you 17 were discriminated against in the termination of employment of the work was the alled about that right? 6 Q. A. No. 7 Q. No, I3, "On November 6, 2003, Parsley called 8 Hansen and told him AON Risk Services had hired a woman to 2 paleae him and she (the worman) would be sitting at his desk when her trender." We talked about that right?  8 A. No. 9 Q. So, you obviously think it's going to take before your — your franchise business starts making money?  9 A.		_		
5 A. Yes. 6 Q. One's you. One's Mr. Canter that really 7 transferred; right? 8 A. I believe he was terminated from the position he 9 was in. 10 Q. And the third resigned, and that was Bob? 11 Q. "McDonough replaced all three of these men with 13 females." Who replaced them, to your knowledge? I don't 14 know whether I've saked you that. 15 A. Please repeat that. 16 Q. I don't think I've ever asked you that. 17 A. Please repeat that. 18 Q. Who - who replaced Canter? 19 A. I replaced Canter initially, and then Sharon Patin 19 replaced me. 21 Q. "One's Mr. Canter initially, and then Sharon Patin 22 A. Donna Parsley. 23 Q. 10, "On May Sth, 2003, McDonough demoted Hansen to 24 the position of Assistant Director. 25 A. Yes. 26 Q. 11, "Instead, McDonough gave the Director, 26 A. Yes. 27 Q. "The female who was given the job had no insurance 28 experience at the time. Hansen had nine years." We have 29 talked about that; right? 20 A. No. 21 Q. 12, "Then, on November 4th, 2003, McDonough 20 to the female who was given the job had no insurance 3 experience at the time. Hansen had nine years." We have 4 to the position of the state of the time. Hansen had nine years." We have 5 A. Yes. 11 Q. 12, "Then, on November 4th, 2003, McDonough 12 notified Hansen he was going to be terminated, but asked him to tstay on for one month to complete a special assignment." 14 We have talked about that; right? 15 A. Yes. 16 Q. Any other facts that support your belief that you 17 were discriminated against in the termination of employment is other than what we have talked about to far today? 19 A. No. 20 Q. No. 13, "On November 6, 2003, Parsley called 21 Hansen and told him AON Risk Services had hired a woman to treplace him and she (the woman) would be sitting at his desks 22 when he returned." We talked about that afready; right? 23 A. Yes. 24 A. On. 25 word of the valued about that it right? 26 A. Yes. 27 Q. Po. 13, "On November 6, 2003, Parsley called 28 A. No. 29 Q. No. 13, "On November 6, 2003, Parsley called 29 A. No. 30 Q. No. 13, "	3		3	1
6 A. Ves.  7 A. I believe he was terminated from the position he 9 was in. 10 Q. And the third resigned, and that was Bob? 11 A. Bob Hamilton. 12 Q. "McDonough replaced all three of these men with 13 females." Who replaced them, to your knowledge? I don't 14 know whether I've asked you that. 15 Q. Who – who replaced Canter? 16 Q. I don't think I've ever asked you that. 17 A. Please repeat that. 18 Q. Who – who replaced Canter? 19 A. I replaced Canter initially, and then Sharon Patin 20 replaced me. 21 Q. Wno replaced Bob? 22 Q. Q. 10, "On May 5th, 2003, McDonough demoted Hansen to 24 the position of Assistant Director. Doman Parsley became 25 Hansen's direct supervisor." We have talked about that; 26 Q. 11, "Instead, McDonough gave the Director, 27 Q. Q. 11, "Instead, McDonough gave the Director, 28 experience at the time. Hansen had nine years." We have talked about that; right? 29 Q. 10, "The female who was given the job had no insurance experience at the time. Hansen had nine years." We have talked about that; right? 30 Q. 12, "Then, on November 4th, 2003, McDonough to stay on for one month to complete a special assignment." 40 We have talked about that; right? 41 A. Yes. 42 Q. And do you know what benefits you lost? 42 A. No. 43 Q. Do you have benefits currently? 44 Q. Do you have benefits currently? 45 A. Yes. 46 Q. Do you have any other, you know, life insurance or anything? 47 A. No. 48 Plaintiff has suffered damages by way of loss of back pay and benefits. 49 Q. How much was that, 120-something? 40 Q. And do you know what benefits you lost? 41 A. I was 123,800. 41 Q. Wo recall the specifies. 41 Q. Wo you have benefits currently? 42 Q. Do you have benefits currently? 43 A. No. 44 Q. Do you have any other, you know, life insurance or anything? 44 A. Yes. 45 Q. Do you have any other, you know, life insurance? 46 A. Yes. 47 Q. No, O. You have any other, you know, life insurance? 48 A. No. 49 Q. Do, you have any other, you know, life insurance? 49 A. No. 40 Q. Pront pay, Okay. What front pay have you lost? 4	4	Q. And we talked about that; right?	4	·
7 Upon 15, "As a result of Defendant's conduct, Plaintiff has suffered damages by way of loss of back pay and the third resigned, and that was Bob? 10 Q. And the third resigned, and that was Bob? 11 A. Bob Hamilton. 12 Q. "McDonough replaced all three of these men with 13 females." Who replaced them, to your knowledge? I don't 13 females." Who replaced them, to your knowledge? I don't 15 A. Please repeat that. 15 Q. Idon't think I've ever asked you that. 16 Q. Idon't think I've ever asked you that. 17 A. Please repeat that. 18 Q. Who – who replaced Canter? 19 A. I replaced Canter initially, and then Sharon Patin replaced me. 21 Q. Who replaced Bob? 22 A. Donna Paraley. 23 Q. 10, "On May 5th, 2003, McDonough demoted Hansen to 24 the position of Assistant Director. Donna Paraley became Hansen's direct supervisor." We have talked about that; 12 Q. Do you have benefits you lost? A. No. 21 right? 2 A. Yes. 2 Q. "The female who was given the job had no insurance as experience at the time. Hansen had nine years." We have talked about that; right? 2 A. Yes. 3 Q. 11, "Instead, McDonough gave the Director, 4 Document Production job to a less qualified female." That say over control that; right? 3 A. Yes. 4 Q. Do you have any other, you know, life insurance or anything else like that? 5 was Overgoner? 6 A. Yes. 7 Q. "The female who was given the job had no insurance at the time. Hansen had nine years." We have talked about that; right? 8 A. No. 9 Q. The female who was given the job had no insurance at the time. Hansen had nine years." We have talked about that; right? 9 A. No. 10 Q. 12, "Then, on November 4th, 2003, McDonough templated application of a sisting and third were distriminated against in the termination of employment of the time who was given the job had no insurance of anything else like that? 9 Q. Do you have any other, you know, life insurance? 19 Q. Port pay. Okay. What front pay have you lost? 20 Q. No. 13, "On November 4th, 2003, McDonough templated payers." We have talked about that; right? 21 Q. Who we	5		5	we?
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14   Row whether I've asked you that.   14   Q. And do you know what benefits you lost? Can you lost   15   tell us what benefits you lost? Can you lost   16   Q. I don't think I've ever asked you that.   16   Q. I don't think I've ever asked you that.   17   A. Please repeat that.   18   Q. Who - who replaced Canter?   18   A. I don't recall the specifies.   17   Q. Do you -   18   A. But it would be medical benefits.   18   Q. Who replaced Bob?   20   Q. Do you have benefits currently?   20   A. No.   21   Q. Do you have benefits currently?   21   Q. Do you have benefits with the position of Assistant Director. Donna Parsley became Hansen's direct supervisor." We have talked about that; right?   2   A. Yes.   2   Q. So, you don't have any medical coverage at all?   3   A. No.   2   Q. So, you don't have any medical coverage at all?   3   A. That's right.   3   A. That's right.   4   A. No.   2   Q. Do you have any other, you know, life insurance or anything else like that?   4   A. No.   4   Q. I2, "Then, on November 4th, 2003, McDonough to text the time. Hansen had nine years." We have talked about that; right?   4   A. Yes.   10   Q. 12, "Then, on November 4th, 2003, McDonough to text that what we have talked about that; right?   4   A. Yes.   10   Q. 10, you have any other, you know, life insurance?   4   A. No.   10   Q. Front pay. Okay. What front pay have you lost?   10   Q. Front pay. Okay. What front pay have you lost?   10   Q. By you be any projections or anything?   10   Q. Do you have any projections or anything?   10   Q. Do you have any projections or anything?   10   Q. Do you have any projections or anything?   10   Q. Do you have any projections or anything?   10   Q. Do you have any projections or anything?   10   Q. Do you have any projections or anything?   10   Q. Do you have any projections or anything?   11   Q. Do you have any projections or anything?   11   Q. Do you have any projections or anything?   11   Q. Do you have any projections or anything?   12   Q. Do you have any projec	12	Q. "McDonough replaced all three of these men with	12	Q. How much was that, 120-something?
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19 A. I replaced Canter initially, and then Sharon Patin 20 replaced me. 21 Q. Who replaced Bob? 22 A. Donna Parsley. 23 Q. 10, "On May 5th, 2003, McDonough demoted Hansen to Hansen's direct supervisor." We have talked about that;  Page 207  1 right? 2 A. Yes. 3 Q. 11, "Instead, McDonough gave the Director, 4 Document Production job to a less qualified female." That 5 was Overgoner? 4 A. Yes. 6 A. Yes. 7 Q. "The female who was given the job had no insurance experience at the time. Hansen had nine years." We have talked about that; right? 10 Q. 12, "Then, on November 4th, 2003, McDonough notified Hansen he was going to be terminated, but asked him to stay on for one month to complete a special assignment." 10 We have talked about that; right? 11 Q. 12, "Then, on November 4th, 2003, McDonough notified Hansen he was going to be terminated, but asked him to stay on for one month to complete a special assignment." 10 We have talked about that; right? 11 Q. 12, "Then, on November 4th, 2003, McDonough notified Hansen he was going to be terminated, but asked him to stay on for one month to complete a special assignment." 10 Q. 12, "Then, on November 4th, 2003, McDonough notified Hansen he was going to be terminated, but asked him to stay on for one month to complete a special assignment." 10 Q. 12, "Then, on November 6, 2003, Parsley called than what we have talked about so far today? 11 A. No. 12 MR. FIDDLER: Objection, form. 13 Q. (BY MR. NOTESTINE) Let me ask this: How long of the population of the plant in the termination of employment to the tran what we have talked about so far today? 10 Q. No. 13, "On November 6, 2003, Parsley called thansen and told him AON Risk Services had hired a woman to replace him and she (the woman) would be sitting at his desk when he returned." We talked about that already; right?  19 A. No. 21 Q. Do you have eany vother, you know, life insurance or anything else like that? 22 Q. So, you obviously think it's going to pay off at some point? 23 A. That's right. 24 A. No. 25 A. No. 26 A.	18	Q. Who who replaced Canter?	18	
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9 talked about that; right?  10 A. Yes. 11 Q. 12, "Then, on November 4th, 2003, McDonough 12 notified Hansen he was going to be terminated, but asked him 13 to stay on for one month to complete a special assignment." 14 We have talked about that; right? 15 A. Yes. 16 Q. Any other facts that support your belief that you 17 were discriminated against in the termination of employment 18 other than what we have talked about so far today? 19 A. No. 19 Q. No. 13, "On November 6, 2003, Parsley called 21 Hansen and told him AON Risk Services had hired a woman to 22 replace him and she (the woman) would be sitting at his desk 23 when he returned." We talked about that already; right?  9 A. No. 10 Q. Front pay. Okay. What front pay have you lost?  10 Q. Front pay. Okay. What front pay have you lost?  11 Do you know?  12 MR. FIDDLER: Objection, form.  13 Q. (BY MR. NOTESTINE) Let me ask this: How long of you think it's going to take before your your franchise  14 you think it's going to take before your your franchise  15 business starts making money?  16 A. I don't know.  17 Q. Do you have any projections or anything?  18 A. No. 19 Q. But you're not looking for another job?  20 A. No. 21 Q. So, you obviously think it's going to pay off at  22 some point?  23 A. Yes.	8	`	8	
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23 when he returned." We talked about that already; right?  23 A. Yes.			ı	
,, S				- I
		• • •	24	Q. No idea when that would be?
		·		-
25 Q. You then talk about the fact you were 25 A. No.	۷3	Q. I ou men taik about the fact you were	دد	Z3. 110.

Page 218 Page 220 1 A. I don't know. 1 Q. Why did you do that? 2 2 Q. Last document. A. Because her performance was not up to par for an 3 3 (Exhibit No. 23 was marked) assistant director. 4 Q. I'm handing you what's been marked Exhibit 23. 4 Q. At the top of the next page it says "Mark Hansen 5 Can you tell us what that document is? replaces John Canter as Director of CAS." A. This is the timeline that I put together while I 6 6 A. Yes. 7 7 Q. You mentioned that before. Who - who put you in was an employee. 8 Q. We have talked about this a couple times; right? 8 that position? 9 A. Yes. 9 A. Miss McDonough. 10 Q. And, again, I don't want to go over this whole Then it says "Rachel Morales transfers to be AD of 10 Q. 11 thing; but tell me what the first page is essentially. 11 DM." That's just a line of people working for you; right? 12 A. It's a description of the units that were Excuse me? 12 13 contained within the CSU. 13 Q. She was one of the people working for you? 14 Q. And those kind of changed around sort of weekly; 14 A. Yes. 15 right? 15 Q. Summer of 2002, Lauretta Hines, who's that? 16 A. Yes. 16 A. She was an employee in document control. She was 17 Q. And this is kind of an interesting little chart on 17 an assistant director. the next couple of pages. What's all -- what's all this? O. Who terminated her? 18 19 A. These are the staff changes that took place while 19 A. I don't know. 20 20 I was an employee. Is that somebody that reported to Miss McDonough? Q. Now, there always were these different departments 21 21 A. I don't know. 22 here; and then you just kind of put who was the person 22 O. Here's Shari Asher is terminated in the fall of 23 working in those departments at that time? 23 2002. Who is she? 24 A. Yes. 24 A. She was an assistant director in Aon Natural 25 Q. And how did you do that? Did you just remember 25 Resources. Page 221 Page 219 that or is that something you kind of kept as you went Q. Is this a department that reported to Miss 1 2 along? 2 McDonough? 3 A. I kept as I went along. 3 A. At one point, yes. 4 Q. And if there's blanks -- for example, you look Q. Do you know if she was terminated by 4 down under "Winter 2002." And under "CRS" there's nobody. Ms. McDonough? 5 6 Does that mean Dan's still there or --6 A. I don't know that. Q. Fall of 2003, Suzette Rosser resigns. Do you know 7 A. Yes. 7 Q. So, it's just - if it's not filled out, it 8 why she resigned? doesn't mean nobody's there. It just means that there's no 9 A. No, I don't know why. Q. Below that it says "Kay Rein terminated. Accepts 10 change there; is that right? 10 nonmanagement position in CSU." Do you know what happened 11 A. Yes. 11 Q. Here's this example. "Karen Pon asked to leave." there? 12 12 13 Who is Karen Pon? 13 A. No. 14 A. She was an assistant director in the client 14 Q. Do you know who she reported to? 15 15 A. No. connection unit. Q. I assume Kay is a female; right? Q. And who did she report to? 16 16 17 A. Yes. 17 A. Mary Salazar. 18 Q. Do you know why she was asked to leave? 18 Q. There's a little demographic chart at the bottom A. I do not. 19 of Page 2250, and that's something you put together just 19 from your recollection? 20 Q. "Sherrie Purvis demoted to Senior Specialist." 20 21 Who is Sherrie Purvis? 21 Q. So, you went from 2001 four men and three women as 22 A. Sherrie Purvis was a assistant director in my unit 22 23 in technical operations. 23 director to one man and five women; right? Q. Who did that, demoted her? 24 24 25 25 Q. And assistant directors were four men, 16 women, A. I did.

l	Page 222	-	Page 224
1	and there was one fewer of each by 2003; right?	1	Q "CSBU"
2	A. Yes.	2	A. Yes.
3	Q. Okay. Let's let's look at the timeline, which	3	Q "needs good young managers"?
4	is on the next page. Okay. I'm not going to go over	4	A. Yes.
5	everything in here, but a few things. Under July 2001,	5	Q. Not making an age claim, are you? Are you?
6	second paragraph there, "Sr. Management conference call	6	A. I'm sorry?
7	Vicki complains to Bob that I am not cooperating." What was	7	Q. Not making an age claim, are you?
8	that all about?	8	A. No.
9	A. I worked for John Gabel, and John Gabel asked me	9	Q. Under April/May, the third line down says "Vickie
10	for employment statistics as far as how many employees I	10	discusses with Sharon and I terminating John Canter."
11	had. I provided him the information. Stephanie Stephens	11	A. Uh-huh.
12	called, asked me for the same information. And I said I had	12	Q. What tell me about that discussion.
13	provided it to John. "If you still need it, let me know."	13	A. All she said was that she was going to terminate
14	She said she would ask Miss McDonough if she still needed	14	him.
15	it. And I never heard back from them. And then I found out	15	Q. Oh, you were not involved in the decision? She
16	from Mr. Gabel that Miss McDonough called Bob Bondi and said	16	was just letting you know that was going to happen?
17	I wasn't cooperating.	17	A. Yes, I was not involved in the decision.
18	Q. So, that's one time where she had complained to	18	Q. The next sentence says she does terminate him, but
19	somebody; right?	19	then he gets another job; right?
20	A. Uh-huh.	20	A. Yes.
21	Q. About you; is that right? You need to say "yes"	21	Q. Next the next paragraph says "Amy Phillips,
22	or "no." You just said, "Uh-huh."	22	Specialist in CAS, resigns. Vickie makes her a Sr.
23	A. Yes.	23	Specialist and she stays with the company." Is that the
24	Q. So, the managing directors happened to be in	24	same person that we looked at that that was demoted, you
25	Chicago when the World Trade Center thing happened?	25	said?
	Page 223		Page 225
1	Page 223 A. Yes.	1	Page 225 <b>A. No.</b>
1 2		1 2	
	A. Yes.	i	A. No.
2	<ul><li>A. Yes.</li><li>Q. Wow, that's amazing. So, that would include</li></ul>	2	A. No. Q. That's something different?
2	A. Yes. Q. Wow, that's amazing. So, that would include Gabel?	2 3	<ul><li>A. No.</li><li>Q. That's something different?</li><li>A. Yes.</li></ul>
2 3 4	<ul><li>A. Yes.</li><li>Q. Wow, that's amazing. So, that would include Gabel?</li><li>A. Yes.</li></ul>	2 3 4	<ul> <li>A. No.</li> <li>Q. That's something different?</li> <li>A. Yes.</li> <li>Q. So, apparently Vicki demoted Amy Phillips?</li> </ul>
2 3 4 5	<ul> <li>A. Yes.</li> <li>Q. Wow, that's amazing. So, that would include</li> <li>Gabel?</li> <li>A. Yes.</li> <li>Q. Who else who else would that include?</li> </ul>	2 3 4 5	<ul> <li>A. No.</li> <li>Q. That's something different?</li> <li>A. Yes.</li> <li>Q. So, apparently Vicki demoted Amy Phillips?</li> <li>A. No.</li> </ul>
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1	Q.	That's Vicki's boss; right?
2	A.	Yes.
3	Q.	"He states that if the field lose:
4	he mu	st make a change, just like he di
5	Wood	hat confidence in view? Whale h

- es confidence then
- lid with Joe and Karen."
- Was that confidence in you? Who's he -- who's he saying
- loses confidence? 6
- 7 A. It's a general statement that he made.
- 8 Q. You're calling him about, what, looking for
- another position within --
- 10 A. Job advice. I was invited to call him.
- 11 Q. Okay. Then it says the next day you called John
- 12 Gabel, and he offered you an AD position in New York.
- 13 A. Yes.
- 14 Q. Did you think about taking it?
- 15 A. I had just had a baby. My wife and I had just had
- 16 a baby. I didn't - I did consider it. However -
- 17 Q. But you decided to stay anyway?
- 18 A. Yes.
- 19 Q. He says that you would have to take a pay cut even
- 20 if you stayed in Houston.
- 21 A. Yes.
- 22 Q. But that didn't actually happen, did it?
- 23 A. No.

1

- 24 Q. We've talked about the 10-13 meeting there at the
- 25 bottom of that page; right?

1 Yes. A.

- And then we talked about the Florida team?
- 3

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15

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- Q. We have talked about the rest of that; right?
- 5 Yes. Α.
- Q. It looks like the on the 4th Vicki raises this
- 7 thing with the three AD work not being even too; right?
- 8 A. That's what I've written, yes.
  - Q. So, that must have happened, then, right, because
- 10 you wrote it down?
- 11 A. Yes.
  - Q. And you were doing it at the time all this was
- 13 going on; right?
- 14 A. Yes.
  - Q. You said "They want someone who had been an
- Account Manager before and they were terminating me since I 16
- 17 have not had that experience in the past." That was -- she
- 18 said that in the meeting?
- 19 A. Verbatim, yes.
  - Q. Now, who is an account manager? Was the person
- 21 that replaced you an account manager?
- 22 A. I don't know.
  - She told you she -- you could look for another
- 24 business -- another position in the business unit; right?
- 25 A. Yes.

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- A. Yes.
- Q. Look at the 10-29. There's a little more detail 2
- here than I think we discussed when we discussed that
- earlier. "Donna called and asked to speak with me. I met
- 5 with her in her office where she discussed the fact that she
- 6 felt the three Assistant Directors workload was not evenly
- 7 distributed." That's a little different than what we talked
- about before, isn't it? I mean, the fact -- it sounds like
- you weren't doing as much work as the other two people.
- 10 A. That's not a correct statement.
- Q. Well, I guess there's two ways to look at that. 11
- One, did she say that? And, two, whether it's true or not
- 13 is another situation.
- 14 A. She asked me what my work activities were during
- 15 the day.
- 16 Q. Okay. Well, this is something you wrote; right?
- 17 A. Right.
- Q. So, she must have said that the workload was not 18
- 19 evenly distributed; right?
- 20 A. Okay. Right, yes.
- 21 Q. And then she asked you about your work activity?
- 22 A. Yes.
- 23 Then it says "Donna stated I couldn't have the
- 24 Dallas team because it took Tracie a long time to develop a
- relationship with them." Did we talk about that?

- Q. She said she would be happy to write you a 1
- reference. "She stands up extends her hand. I state that
- I'm not going to shake her hand."
  - A. Yes.
- Q. Is that true? 5
- 6 A. Yes.
- Why didn't you want to shake her hand? 7
- 8 It wasn't appropriate.
- 9 Why not?
- 10 Because it wasn't.
- You just didn't feel like doing it? 11 Q.
- 12 A. No.
- Q. "Ernie Joyner remains behind with me and discusses 13
- 14 there is no severance as they are going to replace the
- position." Did you ask him anything about that? 15
- 16 A. No.
- Q. On the 4th of December, "Sharon Patin leaves a 17
- voice mail on my cell phone asking me to call her if I am 18
- interested in completing the Special Project. I did not
- return her phone call." So, it sounds like you didn't
- 21 complete the special project.
- 22 A. No, I did complete the special project. But I was
- 23 invited to come back as a temporary employee working for --
- 24 through a temporary agency.
- 25 Q. It doesn't say that, though, does it?

	Page 238		Page 240
1	A. Well, like I said, it's just my notes.	1	Q. Any facts that support your claims against Aon
2	Q. So, she did call — she must have called and asked	2	that we have not already discussed today?
3	you to complete the project, and you did not even return her	3	A. No.
4	call; right?	4	MR. FIDDLER: Objection, form.
5	A. My employment was ended on December the 2nd. My	5	MR. NOTESTINE: I pass the witness.
6	employment with Aon ended December the 2nd.	6	EXAMINATION
7	Q. Why would she ask you to this is something you	7	BY MR. FIDDLER:
8	wrote down.	8	Q. Were you married have you been married the
9	A. Right. She called me and said I could come back	9	entire time since your termination from Aon?
10	if I wanted to work through Manpower Temporary Services as a	10	A. Yes.
11	temp employee working for Manpower but placed at Aon.	11	Q. So, would your wife have been able to observe some
12	Q. Working on this special project that you had	12	of the mental anguish that you've suffered and how it's
13	already completed?	13	affected you?
14	A. It's an ongoing project. There are multiple	14	MR. NOTESTINE: Objection, leading.
15	people doing the project.	15	Q. (BY MR. FIDDLER) Can you tell us whether or not
16	Q. So, it wasn't completed?	16	your wife has observed any of the mental anguish and other
17	A. No.	17	ways in which your termination has adversely affected you?
18	Q. It was still going on?	18	A. Yes.
19	A. Right.	19	MR. NOTESTINE: Objection, leading.
20	Q. Is there any reason you didn't put down the	20	MR. FIDDLER: I pass the witness.
21	this stuff about the temporary and the Manpower stuff?	21	Is there anything else?
22	A. No.	22	MR. NOTESTINE: No. That's it.
23	Q. Have you talked to anybody else about this case	23	MR. FIDDLER: Okay.
24	other than those people you mentioned when we first started	24	THE VIDEOGRAPHER: Going off the record.
25	talking today?	25	The time is 5:00 o'clock p.m.
	3 3		The time is 5.00 o clock p.m.
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1	A. No.	1	CHANGES AND SIGNATURE
2	Q. Besides what we have talked about here today, did	2	WITNESS NAME: MARK A. HANSEN DATE: MAY 10, 2006
3	the company do anything else adversely to you?	3	PAGE LINE CHANGE REASON
4	A. Please repeat the question.	4	
5	Q. Did the company did somebody take you in the	5	
6	back hall and beat you up, did anything else adverse to you	6	
7	other than what we have talked about here today? I don't	7	
8	want you coming in at trial and saying, "They inflicted	8	
9	emotional distress on me," or, "They assaulted me," or	9	
10	something like that.	10	
11	A. No assault.	11	·
12	MR. FIDDLER: Objection, form.	12	
13	Q. (BY MR. NOTESTINE) Intentionally inflicted	13	
14	emotional distress. Sorry.	14	
15	Have you ever filed a charge against any other	15	
16	employer?	16	
17	A. No.	17	
18	Q. Have you ever been involved in any other lawsuit	18	
19	either as a defendant or a plaintiff?	19	
20	A. No.	20	I, MARK A. HANSEN, have read the foregoing deposition
20 21			and hereby affix my signature that same is true and correct,
- 1	( ) Have you ever made claims against other employers		·
22	Q. Have you ever made claims against other employers, such as unemployment compensation or anything like that?	22	except as noted above.
	such as unemployment compensation or anything like that?	22 23	except as noted above.
22 23 24	such as unemployment compensation or anything like that?  A. No.		except as noted above.
23 24	such as unemployment compensation or anything like that?  A. No.  Q. Have you ever filed for bankruptcy?	23	except as noted above.  MARK A. HANSEN
23	such as unemployment compensation or anything like that?  A. No.	23 24	